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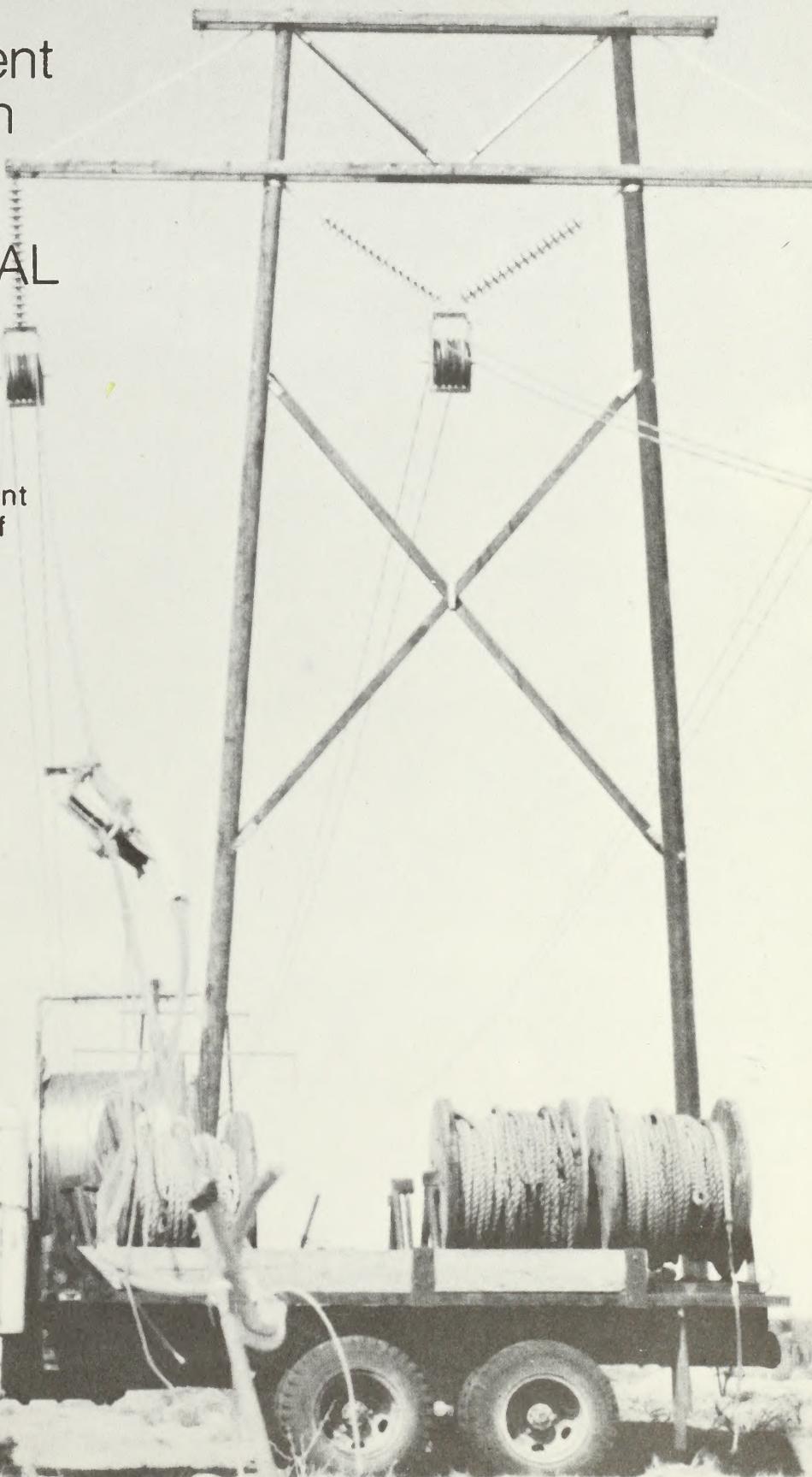
# EL PASO ELECTRIC 345 KV, SPRINGERVILLE TO DEMING, TRANSMISSION LINE PROJECT

Final Management  
Framework Plan  
Amendment

## ENVIRONMENTAL IMPACT STATEMENT

Department of the Interior  
Bureau of Land Management  
Service Center - Division of  
Environmental Impact  
Statement Services

**JULY  
1985**



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# United States Department of the Interior

BUREAU OF LAND MANAGEMENT

IN REPLY  
REFER TO:

Dear Reviewer:

This draft Management Framework Plan Amendment/Environmental Impact Statement (MFPA/EIS) on the proposed El Paso Electric 345 kV, Springerville to Deming, Transmission Line project is submitted for your review and comment. Please retain this draft MFPA/EIS for future reference as the final MFPA/EIS may only be an addendum.

The purpose of this public review is to improve the impact analyses presented in the draft MFPA/EIS. We welcome your comments on this MFPA/EIS. The final MFPA/EIS will be prepared considering comments received.

Comments on the draft MFPA/EIS may be submitted in writing or presented verbally at a public hearing. As indicated elsewhere in this MFPA/EIS, two public hearings will be held to receive oral comments. In order to be considered in the final EIS, all comments must be received by April 30, 1985.

Please make your comments as specific as possible. Comments will be more helpful if they include suggested changes, sources, or methodologies. Comments providing only opinions or preferences will not have a formal response, but will be included as part of the decisionmaking process.

A copy of the final MFPA/EIS will be sent to all persons who provide comments on the draft or to anyone requesting a copy. Please address written comments or requests for copies of the draft or final MFPA/EIS to:

Jack Edwards, Project Leader  
Bureau of Land Management  
Division of EIS Services  
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Sincerely yours,

*Charles W. Luscher*  
Charles W. Luscher  
State Director  
New Mexico State Office

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## Management Framework Plan Amendment/ Environmental Impact Statement

on the

# EL PASO ELECTRIC 345 kV SPRINGERVILLE TO DEMING TRANSMISSION LINE

JULY 1985

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Director, New Mexico State Office



COVER SHEET

Management Framework Plan Amendment/Environmental Impact Statement

on the  
El Paso Electric 345 kV, Springerville to Deming,  
Transmission Line Project

( ) Draft

(X) Final

Lead Agency

U.S. Department of the Interior  
Bureau of Land Management

Cooperating Agencies

U.S. Department of Agriculture  
Forest Service

U.S. Department of Energy  
Bonneville Power Administration

Counties that could be Directly Affected

Luna, Sierra, Socorro, Catron, and Grant Counties, New Mexico

Abstract

The draft and final Management Framework Plan Amendment/Environmental Impact Statements (MFPA/EIS) assess the environmental consequences of the federal approval of the El Paso Electric Company (El Paso) 345 kV, Springerville to Deming, Transmission Line Project.

El Paso proposes to build and operate a 213.5-mile-long, single circuit, 345 kV transmission line from a point on the Tucson Electric Power Company's existing 345 kV transmission line near Red Hill, New Mexico to El Paso's Luna substation, 1.5 miles north of Deming, New Mexico. Major components of the project would include the transmission line and additional substation equipment at the existing Luna substation.

The MFPA/EIS analyzes the effects of building, operating, maintaining, and abandoning the Proposed Action and alternative transmission lines. Three alternatives were assessed in detail: the Very Large Array Alternative (A), the San Agustin Alternative (B), and the Gila Alternative (C). The draft MFPA/EIS also addressed a No-Action Alternative, which analyzed the effects of denying the requested rights-of-way for the transmission line.

Based on the issue of whether to develop a new right-of-way corridor and the concerns identified during the scoping process, the MFPA/EIS focused on potential impacts to the Very Large Array from electromagnetic interference, and to visual resources, wilderness, soils, vegetation, and livestock grazing.

The BLM Proposed Plan is a combination of the modified company's Proposed Action, Very Large Array Alternative (A) and San Agustin Alternative (B). The proposed plan was developed following a 90-day review of the draft MFPA/EIS. The Proposed Plan may be protested. (See Dear Reviewer letter on inside front cover for protest procedures.)

MFPA/EIS Contact

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Date MFPA/EIS Made Available To EPA and the Public

Draft: January 30, 1985

Final: July 31, 1985



The purpose of this final Management Framework Plan Amendment/Environmental Impact Statement (MFPA/EIS) is to supplement the draft MFPA/EIS, which was published January 30, 1985. Reviewed together, the draft and final MFPA/EISs incorporate the analyses of the affected environment and potential environmental consequences resulting from construction and operation of the El Paso Electric 345 kV, Springerville to Deming, Transmission Line Project.

This final MFPA/EIS should not be considered as a complete MFPA/EIS nor as a decision document. The final contains a revised Summary and Comparative Analysis. In addition, this final MFPA/EIS contains a variety of new material. Section 1 contains the Proposed Plan which is a combination of the Company's Proposed Action, Very Large Array (A) and San Agustin (B) alternatives. Section 2 contains a

description and analysis of environmental consequences of the modifications made to the Proposed Action, Very Large Array Alternative (A), and San Agustin Alternative (B) contained in the draft MFPA/EIS. Section 3 contains text changes and additions to the draft MFPA/EIS resulting from the comments received during the review period. Section 4, Consultation and Coordination, contains background information, consultation and coordination processes, and copies of comment letters received during the 90-day review period. All comment letters are reprinted verbatim and responses to individual comments follow immediately after each letter.

The results of the analyses, as documented in the draft and final MFPA/EISs, will be used for making a decision on whether to approve the Proposed Plan.



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## FINAL ENVIRONMENTAL IMPACT STATEMENT

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This summary presents the results of the analysis contained in the draft Management Framework Plan Amendment/Environmental Impact Statement (MFPA/EIS), as modified by the analyses of the changes in the Proposed Action, Very Large Array Alternative (A), and San Agustin Alternative (B) contained in this document.

On October 4, 1983 the El Paso Electric Company (El Paso) applied to the Bureau of Land Management (BLM), Las Cruces District Office, for a right-of-way permit to build and operate a 203-mile-long, 345 kilovolt (kV) transmission line from its Luna substation, 1.5 miles north of Deming, New Mexico, to a point on the existing Tucson Electric Power Company (TEPC) transmission line near Red Hill, New Mexico. About 68.5 miles of the original proposed line would cross public land. The right-of-way would be 100 feet wide. This proposal was analyzed in the draft MFPA/EIS as El Paso's Proposed Action.

As a result of the analyses as well as information received during the public review process for the draft MFPA/EIS, the Proposed Action route was modified by El Paso in May 1985. (See Letter 24, Section 4 of this EIS.) Modifications were also made to the Very Large Array Alternative (A) and San Agustin Alternative (B). The Proposed Action as modified would be 213.5 miles long, crossing 66.9 miles of public land.

The Proposed Action transmission line would use wood towers, with conductors placed at about 800-foot-intervals. The transmission line would need about 1,410 towers or an average of 6.6 structures per mile.

El Paso also proposes to install more equipment at the existing Luna

substation. The additions would consist of a 345 kV circuit breaker, two switches, a dead-end tower, and relay equipment. No more land would be needed for this equipment.

Communication and control would be provided through a microwave radio system. The existing complex already has the needed control house, which would contain electronic equipment and protective relay systems.

The transmission line would be built in two spreads, each consisting of equipment and crews (30 to 65 workers) handling the construction phases of a given segment. Construction would begin at the middle of the line and work toward either end to allow earlier completion of most construction in the higher elevations. Construction would begin in 1986 and continue for 12 months.

Construction would require a 70-foot by 100-foot area at each tower site for placing equipment and assembling towers; spur roads would be needed for access from existing roads to some tower sites. After construction was completed, a two-track road would be built parallel to the transmission line. The road would be needed for routine patrols, once every 6 weeks, and only four-wheel drive vehicles would be used.

In addition to the Proposed Action, four alternatives were considered in the analysis: the Very Large Array (A), San Agustin (B), Gila (C), and No-Action. The draft MFPA/EIS contains a discussion of the construction techniques and types of transmission line towers required for the Proposed Action and alternatives. BLM's Proposed Plan is a combination of El Paso's

modified Proposed Action, the modified Very Large Array Alternative (A), and part of the San Agustin Alternative (B). (The Proposed Plan and its consistency with other plans are discussed in Section 1 of this document.)

## MAJOR ISSUES

During the scoping process, several general concerns were raised relating to electromagnetic interference and effects, wilderness values, visual resources, soils and vegetation, and livestock grazing. Section 4, Consultation and Coordination, lists the resource concerns and details the results of the scoping and public review process for the draft MFPA/EIS.

## MAJOR IMPACT CONCLUSIONS

The analysis of the El Paso Electric 345 kV, Springerville to Deming, Transmission Line Project focused on impacts caused by:

- displacing resources (such as cultural resources);
- using resources or creating other changed conditions (such as vegetation removed during construction); and
- creating changed conditions on the human and natural environment of the area (such as visual disturbances).

This project would cause some short-term and long-term impacts. The significance of potential impacts to the various resources from project construction and operation were based on the significance criteria identified by resource in Chapter 2 of the draft MFPA/EIS.

Water resources, mineral and fossil resources, cropland, and aquatic wildlife were not analyzed in the

draft MFPA/EIS because these resources or conditions would not be significantly affected by the Proposed Action or alternatives.

No federally listed or proposed, threatened or endangered plant or animal species are known to occur along any of the proposed routes, but three candidate species could be affected by the El Paso project--loach minnow, spinedace, and Mimbres figwort. In addition, no state-listed or proposed threatened or endangered animal species would be affected by any of the routes. Eleven plant species, listed by the State of New Mexico as taxa of concern, could occur on or along some or all of the routes.

Once a route has been chosen and a staked line established, surveys should be carried out for state-listed threatened or endangered species. This survey should be coordinated with New Mexico's Natural Resources Department, Resources Management and Development Division. (See letters from Fish and Wildlife Service and the State of New Mexico, Appendix 3 of the draft MFPA/EIS.)

Since no federally listed or proposed species occur along any of the proposed routes, formal Section 7 consultation with the Fish and Wildlife Service was not required; therefore, a biological assessment was not required (Roehm 1984).

The impact analyses assumed that certain types of mitigation would be implemented to ease or reduce adverse impacts, including measures incorporated into the applicant's proposed plan of operations. These measures are committed to by the applicant and are described in Appendix 2 of the draft MFPA/EIS.

### Electromagnetic Interference and Effects

Neither the Proposed Action nor the alternatives would cause electromagnetic interference with either the existing Very Large Array (VLA) or the proposed Very Long Baseline Array. Construction of the Proposed Action route would preclude the proposed 13-mile extension of the southwest arm of the VLA; however, none of the alternatives would affect the proposed extension.

The results of scientific studies of electric or magnetic fields have not shown that transmission lines noticeably affect the health or behavior of humans, livestock, or wildlife.

### Visual Resources

The main significant adverse visual resource impacts from the Proposed Action or alternatives would result from placing a transmission line on a natural-appearing landscape. The changes would generally not meet the standards of the Visual Resource Management (VRM) class or Visual Quality Objective for the areas where the project would be located.

The Proposed Action would significantly affect 7 miles of VRM Class II areas, 22.5 miles of Class III areas, and 8.5 miles of Class IV areas. The Very Large Array Alternative (A) would significantly affect 25.5 miles of VRM Class II areas, 14.5 miles of Class III areas, and 4 miles of Class IV areas. The San Agustin Alternative

(B) would significantly affect 10.5 miles of VRM Class II areas, 41 miles of Class III areas, and 2.5 miles of Class IV areas. The Gila Alternative (C) would significantly affect 43.5 miles of VRM Class II areas, 34.5 miles of Class III areas, and 7.5 miles in a Forest Service, Visual Quality Objective, Partial Retention area. Adding a third transmission line along the two existing TEPC lines would create a cumulative impact on the visual resource that would not be an acceptable change.

### Cultural Resources

Because the exact locations of transmission line facilities are unknown for the Proposed Action or alternative routes, specific cultural resource impacts cannot be predicted. Effective use of the cultural survey and compliance procedures described in Appendix 2 of the draft MFPA/EIS would prevent significant, adverse cultural resource impacts.

### Wilderness

No significant, direct impacts to the wilderness resource are anticipated as a result of the Proposed Action or alternative routes crossing the boundary of any unit, since no crossings are planned. Noise and dust from construction of any of the transmission lines would be temporary and insignificant.

Outside sights of a transmission line from the following units may affect the users, depending on their perspective and viewpoint.

Route	Unit
Proposed Action	Mesita Blanca and Eagle Peak Wilderness Study Areas (WSAs)
Very Large Array Alternative	Mesita Blanca, Eagle Peak, Horse Springs, and Continental Divide WSAs
San Agustin Alternative	Mesita Blanca, Eagle Peak, Horse Springs, and Continental Divide WSAs
Gila Alternative	Blue Range Wilderness and San Francisco WSA

#### Recreation Resources

Most of the significant impacts to recreation from the Proposed Action or alternatives would involve degradation of scenic areas and views. The Proposed Action and San Agustin Alternative would significantly degrade the scenic values of the Plains of San Agustin; the Very Large Array and San Agustin alternatives would significantly degrade the scenic, semi-primitive values in the Horse Springs and Continental Divide WSAs. The Proposed Action and the San Agustin and Very Large Array alternatives would significantly affect the scenic qualities of the Red Hill cinder cone area of the Mesita Blanca WSA as well as the natural and primitive nature of the Eagle Peak and Mesita Blanca WSAs.

The Gila Alternative would significantly affect recreation opportunities and users of the Gila and San Francisco rivers. Similarly, sightseers along U.S. Highway 180, including the Aldo Leopold Vista, and visitors to the Blue Range Wilderness would be distracted from the scenic quality of the areas because of the cumulative, long-term impacts of an additional transmission line near two existing TEPC transmission lines.

The Proposed Action and alternatives would not significantly impair the scenery enjoyed by hikers on the Continental Divide National Scenic Trail.

#### Soils and Vegetation

Transmission line construction would create land disturbances associated with (1) access trail and road upgrading, (2) temporary road construction, (3) tower pad location site clearing and grading, (4) right-of-way clearing for safe clearance from conductors, and (5) storage and staging area clearings. The following acreages would be temporarily disturbed (all would be reclaimed):

Proposed Action--640.5 acres

Very Large Array Alternative  
--642 acres

San Agustin Alternative--706.5 acres

Gila Alternative--464 acres

The Proposed Action and alternatives would similarly affect soils and vegetation. Impacts to soil would not be significant from any route because soil loss and loss of soil productivity and

stability would be reduced when effective erosion control and reclamation measures were used. Disturbed land would return to near-preconstruction conditions. An unquantifiable amount of soil would be lost from accelerated wind and water erosion until erosion control measures were implemented.

Impacts to vegetation would also generally be insignificant. Understory vegetation is expected to return to near-preconstruction conditions within 5 years after construction with effective use of erosion control, reclamation, and revegetation measures. Overstory vegetation (trees and shrubs) would take longer to become established to near-preconstruction conditions but would be growth-controlled or permanently removed and replaced with understory vegetation to allow access and provide safe transmission line operation. Generally, only small areas (at tower sites and beneath the lines) of overstory would be disturbed. Because of construction needs, larger areas may be disturbed in steeper terrain.

#### Livestock Grazing

Transmission line construction would cause a 1- to 5-year insignificant forage loss.

A transmission line operating directly over or within 250 feet of ranch facilities could pose potential hazards to the maintenance of wells and windmills; storage of livestock feed; and use of ranching equipment such as loaders, booms, and large trucks. These hazards could occur from contact with towers and conductors, causing injury, possible electrocution, and equipment damage.

Less than 10 percent of the areas disturbed by the Proposed Action or alternatives would be invaded by poisonous and invader plants. This is considered to be insignificant.

The Proposed Action and the alternatives would pass within 250 feet of the following numbers of ranch headquarters or dwellings and livestock watering facilities:

Route	Ranch Headquarters or Dwellings	Livestock Watering Facilities
Proposed Action	1	4
Very Large Array Alternative	1	3
San Agustin Alternative	2	11
Gila Alternative	5	9

#### Socioeconomics

Neither the Proposed Action nor the alternatives would significantly affect socioeconomics (social and economic conditions) but would cause the following insignificant impacts. (All of these would be temporary impacts resulting from construction of the transmission line except the property tax

revenue increases, which would continue for the life of the transmission line.)

Between 1986 and 1987, construction of the Proposed Action or the Very Large Array or San Agustin alternatives would result in population growth ranging from 4 percent in Datil and 3 percent in Quemado-Omega to 1 percent or less

in other communities. Total employment growth would vary from 2 percent in Luna and Sierra counties to less than 1 percent in Apache County, Arizona. Per capita personal income and property tax revenue would increase by less than 1 percent in all counties.

The Gila Alternative is expected to cause a population increase ranging from 4 percent in Reserve to less than 1 percent in Bayard, Central, Hurley, and Deming. Total employment growth would vary from 2 percent in Catron and Grant counties to less than 1 percent in Apache County. The per capita personal income increase would vary from 3 percent in Catron County to 1 percent in Apache and Luna counties. Local government revenue would rise less than 1 percent in all jurisdictions.

#### Transportation Networks

Construction of the Proposed Action or the Very Large Array Alternative (A) would significantly affect transportation by increasing traffic volume on New Mexico State Highways 52, 78, and 12. Traffic along these roadway segments could fall below a safe operating level during this time. In addition, increased project-related traffic on these highways would temporarily increase accidents by 12.4 per year; 3.9 of these accidents could occur at intersections and junctions.

Increased heavy truck and traffic volume on secondary gravel and primitive roads (trails) could accelerate road deterioration and could significantly increase road maintenance costs.

Transportation impacts from construction of the San Agustin Alternative would be similar to those from the Proposed Action. Traffic volume would temporarily increase on segments of U.S. Highway 60 and State Highways 78,

12, 52, 90, 27, and 26. Project-related traffic could add as many as 117 vehicle trips per day to the roadway segments. U.S. Highway 60 and State Highways 26 and 90 could sustain the increased auto and truck traffic without lowering the level-of-service; the other highway segments could not. Increased project-related traffic on roadway segments would temporarily increase accidents by 13.2 per year; 4.1 of these accidents would occur at intersections and junctions.

Construction of the Gila Alternative would significantly affect transportation by increasing traffic volume on U.S. Highway 180 from south of Gila National Forest to Alpine, Arizona, and on Bill Knight Gap Road to U.S. Highway 60. These increases in traffic could lower the level-of-service. Increased project-related traffic on U.S. Highway 180 between Cliff and the Arizona State line would temporarily increase accidents by 7.2 per year; 4.4 of these accidents could occur at intersections and junctions. The level-of-service would not be lowered by project-related traffic increases on U.S. Highway 180 between the southern boundary of the Gila National Forest and Deming, nor on U.S. 60 between Springerville, Arizona and the junction of Bill Knight Gap Road.

#### Air Quality

The Proposed Action and alternatives would have similar insignificant impacts on air quality. Transmission line construction could stir up particulate matter and emit gaseous hydrocarbons and oxides of sulfur and nitrogen into the atmosphere. The impact of these transient pollutants on sensitive persons or species would depend on topographic and meteorological factors as well as the amount of each pollutant emitted.

Construction may cause temporary intermittent violations of the National Ambient Air Quality Standard for 24-hour total suspended particulates but would not lead to annual particulate levels above the annual standard. Construction impacts would be temporary and would not need analysis or permitting by air pollution control agencies. Transmission line operation would produce only minor amounts of ozone and oxides of nitrogen from corona reactions.

#### Terrestrial Wildlife

Long-term losses of wildlife or wildlife habitat from the Proposed Action or alternatives would be insignificant because they would represent less than 1 percent of the habitat in the affected areas.

If El Paso adheres to its construction schedule, most direct impacts to terrestrial wildlife would be avoided, and construction disturbances to mule deer winter ranges during critical times of the year would be reduced.

The human and mechanical disturbances of construction could force some local wildlife populations into adjacent areas, causing stress to both dispersed and existing populations. Disturbances within 1 mile of nesting sites could interfere with successful nesting and production of young birds. Temporary access roads and disturbed sites around power poles would encourage the invasion of grasses and forbs that would increase cover and food for Gambel's and scaled quail and other small, non-game birds.

The potential exists for bird losses from collisions with conductors or overhead ground wires, but this is not expected to be significant because of a lack of bird concentrations along the

routes. Electrocution of birds, especially raptors, would be insignificant if prescribed practices were followed when the towers were built. The towers could provide perching and nesting sites for various types of birds, which would be a beneficial, secondary impact.

Project maintenance roads could be used by persons engaged in illegal shooting of perching or nesting raptors, wanton killing of other species, or illegal hunting of protected game.

#### Forest Management

The San Agustin Alternative would conflict with the draft Gila National Forest Land Management Plan by crossing an area not designated for utility corridors. Moreover, increased wildfire protection would be needed for the corridor to protect the line, and the use of prescribed fire would need to be modified to assure the safety of workers and the transmission line.

The Gila Alternative would conflict with the draft Gila National Forest Land Management Plan because the existing utilities corridor would have to be widened to allow another transmission line. In addition, this alternative would slightly conflict with the timber harvest and visual management goals outlined in this plan. The alternative would remove 220 acres of timber land from production through vegetation clearing for towers and lines. This clearing of vegetation would reduce the allowable harvest by 25,000 board feet per year. Construction of the transmission line would conflict with the Forest Service application of its Visual Management System. Clearing for tower sites, however, would not significantly change the Forest Service goals for management of forage and wildlife habitat.



# **SECTION 1**

## **Proposed Plan**



#### DESCRIPTION OF THE PROPOSED PLAN

The Proposed Plan is a combination of El Paso's Proposed Action, Very Large Array Alternative (A), and part of the San Agustin Alternative (B), as analyzed in the draft Management Framework Plan Amendment Environmental Impact Statement (MFPA/EIS) and as modified in this final. The plan is to grant the El Paso Electric Company a right-of-way across 65.7 miles of public land for construction of its proposed Springerville to Deming, 345 KV transmission line. This right-of-way would be along sections of the routes described as the Proposed Action and the Very Large Array and San Agustin alternatives in the draft MFPA/EIS and as modified by the description of the Monticello and Horse Springs modifications described in Section 2 of this final MFPA/EIS. (See Map 1 for the general location of the Proposed Plan and Table 1 for Data Summary.)

#### SELECTION OF THE PROPOSED PLAN

The Proposed Plan was selected by a team consisting of the District Manager, Area Managers, and staff specialists within the Las Cruces District. The New Mexico State Director then reviewed the analysis and approved the Proposed Plan. The selection of the Proposed Plan was based on (1) the issue and concerns identified during the planning process, (2) public hearings and comments received during the 90-day public review of the draft MFPA/EIS, (3) formal consultation and coordination with other agencies, (4) decision criteria developed and considered by

management (Section 4), and (5) impact analyses of the Proposed Action and alternatives.

#### CONSISTENCY

In the opinion of the Bureau of Land Management, the Proposed Plan would not conflict nor be inconsistent with any known officially approved and adopted resource-related policies or programs.

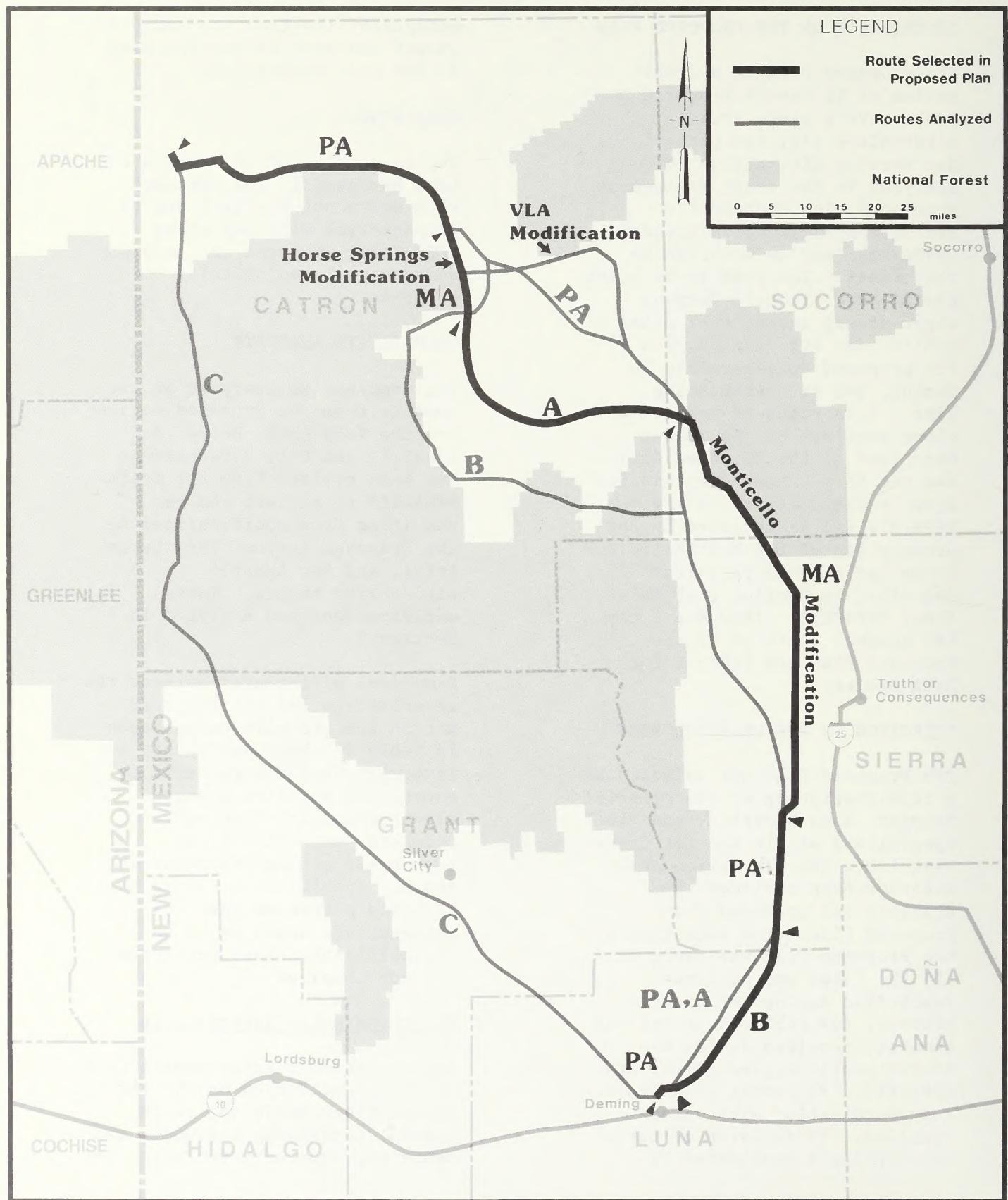
#### COMPARATIVE ANALYSIS

The comparative analysis of the impacts from the Proposed Action and the Very Large Array, San Agustin, and Gila alternatives has been revised from the draft MFPA/EIS to reflect changes resulting from modifications to the Proposed Action, Very Large Array, and San Agustin alternative routes. These modifications are analyzed in Section 2.

Numerical differences between the alternatives and the Proposed Action are shown in parentheses in Table 2. Because impacts to federally listed threatened or endangered wildlife species, electromagnetic effects, cropland, paleontological resources, geological resources, and air quality from either the Proposed Action or the alternatives would be insignificant, these resources are not compared.

#### Electromagnetic Interference

Electromagnetic interference from the Proposed Action or the three alternatives would not reach harmful thresholds and would not cause any adverse effects on the



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## MAP 1 PROPOSED PLAN

**TABLE 1**  
**PROPOSED PLAN**  
**DATA SUMMARY**

Transmission Line Route		
<u>Milepost</u>	<u>Length (Miles)</u>	<u>Section</u>
0.0- 3.6	3.6	Proposed Action
3.6B- 32.3B	28.7	San Agustin Alternative (B)
30.8- 48.0	17.2	Proposed Action
48.0-112.5MA	64.5	Monticello Modification
110.0A-151.0A	41.0	Very Large Array Alternative (A)
151.0A-165.5MA	14.5	Horse Springs Modification
157.0 -203.0	46.0	Proposed Action
TOTAL:	215.5	

Acres Disturbed		
<u>Milepost</u>	<u>Rate (acres/mile)</u>	<u>Acres of Disturbance</u>
0.0A- 4.0A	3	12.0
4.0A- 26.0A	2	44.0
26.0A-215.5A	3	568.5
TOTAL:		624.5

TABLE 2  
COMPARATIVE ANALYSIS

Element	Proposed Action	Very Large Array Alternative (A)	San Agustin Alternative (B)	Gila Alternative (C)
<u>Total Length of Transmission Line (Miles)</u>	213.5	214 (+0.5)	224.5 (+11.0)	173 (-40.5)
<u>Estimated Cost of Transmission Line</u>	\$34,276,000	\$34,338,000 (+\$62,000)	\$42,385,000 (+\$8,109,000)	\$40,068,000 (+\$5,792,000)
<u>Electromagnetic Interference</u>				
Existing VLA Future VLA Expansion	No Interference Interference	No Interference No Interference	No Interference No Interference	No Interference No Interference
<u>Visual Resources</u>				
Miles Significantly Affected				
VRM Class II	7.0	25.5 (+18.5)	10.5 (+3.5)	32.5 (+25.5)
VRM Class III	22.5	14.5 (-8.0)	41.0 (+18.5)	6.0 (-16.5)
VRM Class IV	8.5	4.0 (-4.5)	2.5 (-6.0)	0.0 (-8.5)
VQO Partial Retention	0.0	0.0	0.0	11.5 (+11.5)
Miles of Public Areas of Concern Crossed				
Plains of San Agustin	8.0	25.5 (+17.5)	1.0 (-7.0)	0.0 (-8.0)
U.S. Highway 180 view area	2.0	2.0 (0.0)	2.0 (0.0)	46.0 (+44.0)
U.S. Highway 60 view area	2.5	2.5 (0.0)	2.5 (0.0)	3.0 (+0.5)
State Highway 26 view area	2.0	2.0 (0.0)	27.5 (+25.5)	0.0 (-2.0)
<u>Cultural Resources</u>				
Acres of High Site Probability	180	180 (0)	189 (+9)	170 (-10)
<u>Wilderness</u>				
Wilderness Units Affected (Significance would depend on user's perspective and viewpoint.)	Mesita Blanca and Eagle Peak WSAs	Mesita Blanca, Eagle Peak, Horse Springs, and Continental Divide WSAs	Mesita Blanca, Eagle Peak, Horse Springs, and Continental Divide WSAs	Blue Range Wilderness and San Francisco WSA
<u>Recreation Resources</u>				
Values Significantly Affected	Plains of San Agustin and Mesita Blanca (Red Hill cinder cone), and Eagle Peak WSAs	Plains of San Agustin and Mesita Blanca, Eagle Peak, Horse Springs, and Continental Divide WSAs	Mesita Blanca, Eagle Peak, Horse Springs, and Continental Divide WSAs	Blue Range Wilderness and San Francisco WSA; San Francisco and Gila rivers
<u>Soils and Vegetation</u>				
Acres Disturbed during Construction	640.5	642.0 (+1.5)	706.5 (+66.0)	464.0 (-176.5)
Miles of Sensitive Soils and Terrain Crossed	34.8	39.2 (+4.4)	41.4 (+6.6)	29.3 (-5.5)
<u>Livestock Grazing</u>				
Grazing Loss (AUMs/year, short term)	51	55 (+4)	66 (+15)	60 (+ 9)
Number of Ranch Headquarters and Dwellings within 250 Feet of Line	1	1 ( 0)	2 (+ 1)	5 (+ 4)
Livestock Watering Facilities within 250 Feet of Line	4	3 (-1)	11 (+ 7)	9 (+ 5)
<u>Transportation Networks</u> (Short-term increases)				
Accidents	12.4	12.4 (0)	13.2 (+0.8)	7.2 (-5.2)
Congestion	Yes	Yes	Yes	Yes
Maintenance	Yes	Yes	Yes	Yes
<u>Socioeconomics</u>				
Population Increase (short term)	250	250 (0)	280 (+30)	320 (+70)
Total Construction Employment	250	250 (0)	350 (+100)	440 (+190)
Increase in Annual Local Government Revenue during Operation (\$000)	77	79 (+2)	95 (+18)	99 (+22)

TABLE 2 (Concluded)

## COMPARATIVE ANALYSIS

Element	Proposed Action	Very Large Array Alternative (A)	San Agustin Alternative (B)	Gila Alternative (C)
<u>Terrestrial Wildlife (Acres temporarily disturbed)</u>				
Mule Deer Habitat (Acres)				
All Habitat	378	423 (+45)	266 (-112)	343 (-35)
Crucial Habitats	19	30 (+11)	19 (0)	41 (+22)
Coues Whitetail Deer Habitat	None	None	None	168 (+168)
Elk Habitat	None	None	157 (+157)	64 (+64)
Pronghorn Habitat	147	177 (+30)	263 (+116)	123 (-24)
Bighorn Sheep Habitat	None	None	None	16 (+16)
Black Bear Habitat	177	207 (+30)	307 (+130)	343 (+166)
Javelina Habitat	279	297 (+18)	285 (+6)	394 (+115)
Turkey Habitat	111	110 (-1)	198 (+87)	125 (+14)
Quail Habitat	240	240 (0)	221 (-19)	358 (+118)
<u>Forest Management</u>				
Conflicts with Goals of Draft Management Plan	None	None	Fire Management, Utility Corridor	Utility Corridor, Allowable Saw Timber Harvest, Visual Management, Forage and Wildlife Habitat

Note - Numbers in parentheses represent differences between the Alternative and the Proposed Action

WSAs = Wilderness Study Areas; VLA = Very Large Array; \$000 = thousands of dollars; AUMs = animal unit months; VRM = Visual Resource Management; VQO = Visual Quality Objective

present operations and facilities of the Very Large Array. The Proposed Action would, however, adversely affect the possible future extension of the southwest arm of the Very Large Array. With the Proposed Action in place, the extension could not be built because the transmission line would cause electromagnetic interference that would greatly exceed the threshold level identified in the Significance Criteria (page 34 of the draft MFPA/EIS).

#### Visual Resources

Miles of Visual Resource Management (VRM) classes and Visual Quality Objectives (VQOs) that would be significantly affected by the Proposed Action or alternatives are summarized in Table 2. The table also identifies the miles of public areas of concern that would be crossed.

The Very Large Array Alternative would cross the center of the Plains of San Agustin, where it would be visible for longer distances and longer viewing periods than the Proposed Action transmission line. The San Agustin Alternative would have little visual impact on the Plains of San Agustin.

The Gila Alternative would substantially impair visual resources along U.S. Highway 180 viewing areas, including the Blue Range Wilderness, the San Francisco WSA, and the Aldo Leopold Vista (46 miles within the Gila National Forest). The Proposed Action and Very Large Array and San Agustin alternatives would impair visual resources along 2 miles of this highway. The San Agustin Alternative would substantially

impair visual resources along 27.5 miles of the New Mexico State Highway 26 viewing areas. Although impacts at the U.S. Highway 60 crossing would not be significant due to design considerations incorporated into the project, the Proposed Action and alternatives would similarly affect the view from the highway.

#### Cultural Resources

Since the exact locations of the project facilities are unknown, specific impacts cannot be predicted. However, with extensive cultural inventory and compliance procedures, impacts to cultural resources from the Proposed Action or alternatives should be insignificant (Appendix 2, draft MFPA/EIS).

#### Soils and Vegetation

The Proposed Action would disturb 640.5 acres. The Very Large Array Alternative would disturb 1.5 acres more than the Proposed Action; the San Agustin Alternative, 66 acres more; and the Gila Alternative, 176.5 acres less. The Proposed Action would cross 34.8 miles of sensitive soils and terrain, whereas the Very Large Array, San Agustin, Gila alternatives would cross 4.4 more miles, 6.6 more miles, and 5.5 less miles, respectively.

Impacts to soils would be insignificant and therefore about the same for the Proposed Action and alternatives. Soil and soil productivity and stability would be reduced by using the effective erosion control and reclamation measures outlined in Appendix 2 of the draft MFPA/EIS. Disturbed land would thus be allowed to return to near-preconstruction conditions.

Impacts to vegetation would also generally be insignificant. Understory vegetation is expected to return to near-preconstruction conditions within 5 years after construction with the use of the erosion control, reclamation, and revegetation program outlined in Appendix 2 of the draft MFPA/EIS. Trees and shrubs would take longer to revegetate. Impacts to understory vegetation from the Proposed Action or the alternatives would not differ significantly, even with the variation in the acres disturbed.

#### Livestock Grazing

The differences in short-term loss of animal unit months (AUMs) per year between the alternatives and the Proposed Action routes would not be significant.

Placing a transmission line near ranch headquarters would cause some secondary impacts. The Proposed Action and Very Large Array Alternative would each pass within 250 feet of one ranch headquarters or dwelling; the San Agustin Alternative, within 250 feet of two; and the Gila Alternative route, within 250 feet of five. The Proposed Action and alternative routes would similarly affect livestock watering facilities--each route passing within 250 feet of 3 to 11 such facilities.

#### Wilderness

No direct impacts to wilderness values would occur from the Proposed Action or any of the alternatives. The Proposed Action transmission line would be viewed from the Mesita Blanca and Eagle Peak wilderness study areas (WSAs). The Very Large Array and San Agustin Alternative routes would be viewed from the Mesita Blanca, Eagle Peak, Horse Springs, and Continental Divide WSAs.

The Very Large Array and San Agustin Alternative transmission lines would be in direct sight from the western boundary of the Horse Springs WSA. The Very Large Array Alternative would be seen from the northern boundary of the Continental Divide WSA, and the San Agustin Alternative from its southern boundary. The Gila Alternative would be viewed from the San Francisco WSA and the eastern boundary of the Blue Range Wilderness even though it would parallel two existing transmission lines adjacent to the wilderness. The significance of this impact cannot be determined because significance is highly dependent on the individuals using the areas and their perspective and viewpoints.

#### Recreation Resources

Visual intrusions of the Proposed Action and Very Large Array Alternative would degrade the quality of the recreation experiences, especially for sightseers in the Plains of San Agustin. The Proposed Action and the Very Large Array and San Agustin alternatives would adversely affect sightseeing at Red Hill cinder cone in the Mesita Blanca WSA. The Very Large Array and San Agustin alternatives would significantly affect scenic, semi-primitive values for visitors to the western portion of Horse Springs WSA and the northern and southern portions of Continental Divide WSA.

The Gila Alternative would generally parallel two existing transmission lines through most of the Gila National Forest and the State of New Mexico portion of the Apache National Forest. The two existing lines have already significantly affected scenic, semi-primitive values for forest visitors. The cumulative

effects of a third transmission line adjacent to the existing lines could have some long-term effects on recreation resources, especially in localized areas with extremely steep terrain, adjacent to U.S. Highway 180. The alternative would detract from the scenic values as viewed from the Gila and San Francisco rivers.

#### Transportation Networks

Increased traffic volume during construction could temporarily increase accidents and congestion at specific intersections.

Movement of heavy equipment and material would accelerate the deterioration of gravel and dirt access roads and increase the need for maintenance. Although traffic increases would vary, depending on the alternative, the Proposed Action and alternatives would all similarly affect transportation.

#### Socioeconomics

Construction of the Proposed Action and Very Large Array Alternative routes would each generate employment for 250 workers. Thirty more workers would be needed for the San Agustin Alternative, and 70 more workers would be needed for the Gila Alternative, mainly due to steel tower construction.

Annual local government revenues during project operation would increase by \$77,000 under the Proposed Action; by \$79,000 under the Very Large Array Alternative; by \$95,000 under the San Agustin Alternative; and by \$99,000 under the Gila Alternative. The San Agustin and Gila alternatives would generate \$20,000 more in local government revenues than the Proposed Action and Very Large Array Alternative because of the higher assessed value of the steel towers.

#### Terrestrial Wildlife

The Proposed Action would temporarily disturb 378 acres of mule deer habitat. The Very Large Array Alternative would disturb 45 acres more than the Proposed Action; the San Agustin, 112 acres less; and the Gila Alternative, 35 acres less. A total of 168 acres of whitetail deer habitat and 16 acres of bighorn sheep habitat would be disturbed during construction of the Gila Alternative; 157 acres of elk habitat would be disturbed by the San Agustin Alternative; and 64 acres of elk habitat, by the Gila Alternative.

The Proposed Action would temporarily disturb 147 acres of pronghorn habitat. The Very Large Array Alternative would disturb 30 acres more than the Proposed Action; the San Agustin Alternative, 116 acres more; and the Gila Alternative, 24 acres less. The Proposed Action would temporarily disturb the least amount of black bear habitat--177 acres. The Very Large Array Alternative would disturb 30 acres more than the Proposed Action; the San Agustin Alternative, 130 acres more; and the Gila Alternative, 166 acres more.

The Proposed Action and the Very Large Array and San Agustin alternatives would temporarily disturb about the same amount of javelina habitat, ranging from 279 to 297 acres. The Gila Alternative would disturb 115 more acres of javelina habitat than the Proposed Action. The Proposed Action and the Very Large Array and Gila alternatives would disturb about the same amount of turkey habitat, whereas the San Agustin Alternative would temporarily disturb 87 more acres than the Proposed Action. The Proposed Action and Very Large Array Alternative would

temporarily disturb 240 acres of quail habitat. The San Agustin Alternative would disturb 19 acres less than the Proposed Action, and the Gila Alternative would disturb 118 acres more.

#### **Forest Management**

The San Agustín and Gila alternatives would conflict with the goals of the draft Gila National Forest Land Management

Plan. The existing utilities corridor is full; a new corridor would have to be established to accommodate the alternative transmission lines. The Gila Alternative would slightly decrease allowable saw timber harvest and slightly conflict with forage and wildlife habitat goals. It would also conflict with implementation of the Forest Service Visual Management System.



## **SECTION 2**

### **Project Modifications, Affected Environment, and Environmental Consequences**



SECTION 2  
PROJECT MODIFICATIONS, AFFECTED ENVIRONMENT,  
AND ENVIRONMENTAL CONSEQUENCES

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Based on the analyses in the draft Management Framework Plan Amendment/ Environmental Impact Statement (MFPA/EIS) and information received during the public review process, the Proposed Action, Very Large Array, and San Agustin alternative routes were modified. Changes were made to reduce the impacts on visual resources and ranch headquarters. This section includes a description of the modifications and an analysis of the possible environmental consequences.

#### PROPOSED ACTION

##### Modifications

The Proposed Action as described in the draft MFPA/EIS has been modified by El Paso Electric Company (Letter 24, Section 4) in two locations: (1) Monticello Canyon and (2) Very Large Array. These modifications would increase the length of the Proposed Action by 2 and 8.5 miles respectively, for a total increase of 10.5 miles. Figure 1 shows the differences between the original and modified routes and Map 1-2 of the draft MFPA/EIS was modified accordingly. (See Section 3 for changes to the draft MFPA/EIS.) With the modifications, the Proposed Action would now be 213.5 miles long, disturb 640.5 acres, and cost about \$34,276,000 to build. The modified Proposed Action would cross 66.9 miles of public land (Modified Map 1-2, Section 3).

The Monticello Canyon route modification would start at MP 48

on the original Proposed Action route, head northeast for 4 miles, and then proceed north for about 30 miles. After crossing Alamosa Creek, the route would turn northwest, parallel Monticello Canyon, and emerge from the Canyon about 3/4 mile north of Monticello Box. The line would then run northwest until it intersected the original route at MP 112. The route is mileposted from 48 to 114M and is 2 miles longer than the original.

The Very Large Array (VLA) modification would start at MP 122 of the original Proposed Action route, head northwest until it intersected the Plains of Agustin. From there, it would turn north for about 12 miles, crossing State Highway 12. From that point, the route would head west and a little south for about 20 miles where it would turn to the northwest, intersecting the original route at MP 157. The route is mileposted from 122 to 165.5M and is 8.5 miles longer than the original route (Modified Map 1-2, Section 3).

Construction of these modifications would be the same as described for the Proposed Action in the draft MFPA/EIS.

##### Affected Environment and Environmental Consequences

Impacts to wilderness, recreation, socioeconomic, transportation networks, and air quality from the Proposed Action modifications would be the same as described for the original Proposed Action in the draft MFPA/EIS.

**Original Mileposts:** 0-48

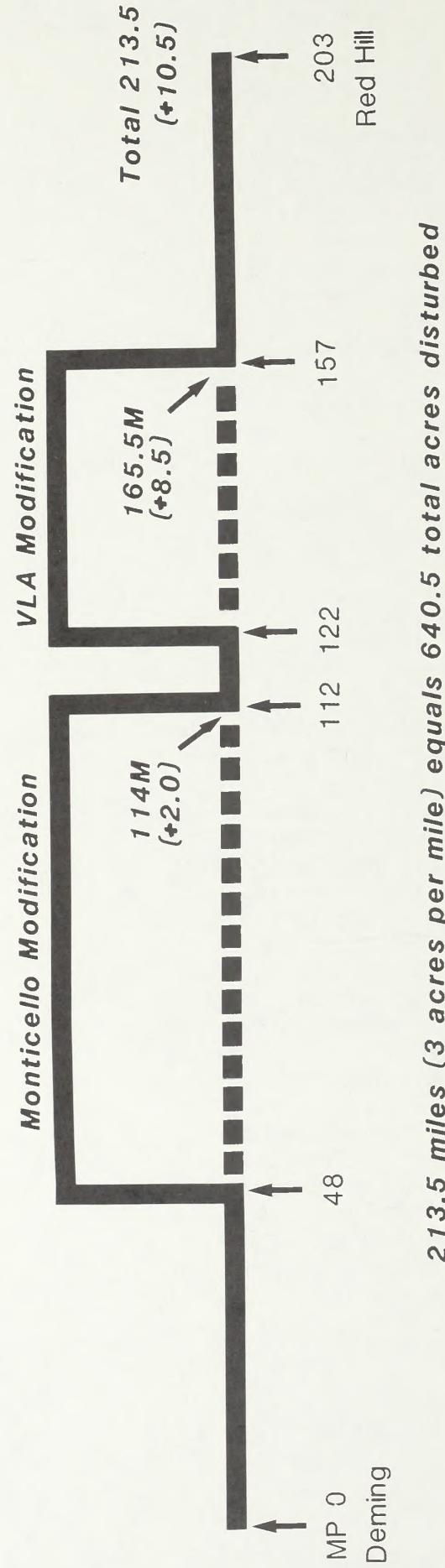
112-122

157-203

**New Mileposts:** 48-114M

122-165.5M

157-203



**FIGURE 1 MODIFIED PROPOSED ACTION**

## **Electromagnetic Interference and Effects**

The revised location would not likely interfere with the existing operation of the VLA, even though the modified location is approximately 2 miles closer to the end of the southwest arm of the VLA. The modified route would be shielded by several points of higher elevation, so no direct line of sight interference would occur. However, vertical interference may occur (little is known at this time about vertical interference). The probability of any interference could be reduced by employing the following measures for about 2 miles on either side of MP 127.7: (1) using a larger conductor and (2) using corona rings around the hardware where the insulator string attaches to the two-conductor bundle. These steps, along with a well-designed insulator string, should reduce electromagnetic interference to an acceptable level. This modification would still preclude any extension of the southwest arm of the VLA.

## **Visual Resources**

The affected environment for the Monticello and VLA modifications is similar to the portions of the original Proposed Action route they replace. Table 3 shows the Visual Resource Management (VRM) classes that would be affected by the modifications. Together, the modifications would cross 14 miles of VRM Class II areas, 13 miles of VRM Class III areas, and 82.5 miles of VRM Class IV areas. See Table 4 for significant adverse impacts caused by the modifications.

## **Cultural Resources**

The same types and magnitude of cultural resources found along the original Proposed Action route are expected along the modified route. The types of impacts are also expected to be similar. The area would be surveyed before construction, according to the procedures outlined in Appendix 2 of the draft MFPA/EIS, to determine the exact number of sites that may be affected.

## **Soils and Vegetation**

The affected environment for the Monticello and VLA modifications is similar to the portions of the original Proposed Action route they replace. The modified transmission line would cross 21.8 miles (65 acres) of soil and terrain most susceptible to impacts. See Table 5 for the locations and extent of these sensitive areas.

The Proposed Action modifications would disturb the same types of vegetation as the original route except a slightly different mix of acres would be disturbed. Impacts to each vegetation type would be the same as described for the Proposed Action in the draft MFPA/EIS.

## **Livestock Grazing**

The affected environment for the Monticello and Very Large Array modifications is similar to the portions of the orginal Proposed Action they replace.

TABLE 3

TOTAL MILES OF VISUAL RESOURCE MANAGEMENT CLASSES  
AFFECTED BY PROPOSED ACTION MODIFICATIONS

Milepost	Miles	Class II	Class III	Class IV
48.0M- 49.0M	1.0			1.0
49.0M- 53.0M	4.0		4.0	
53.0M-112.0M	59.0			59.0
112.0M-114.0M	2.0		2.0	
122.0M-136.0M	14.0	14.0		
136.0M-143.0M	7.0		7.0	
143.0M-165.5M	22.5			22.5
TOTAL:	109.5	14.0	13.0	82.5

See Appendix 5 of the draft MFPA/EIS for definitions of terms.

TABLE 4

**SIGNIFICANT ADVERSE IMPACTS TO VISUAL RESOURCES FROM  
PROPOSED ACTION MODIFICATIONS**

Milepost	Miles	Existing VRM Class <sup>2</sup>	Primary Viewpoints and Description of Impacts <sup>3</sup>
51.0M-55.0M	3.0 1.0	III IV	Viewed from State Highway 90 as fg/mg. Would add elements of form and line to natural-appearing landscape.
71.0M-74.0M	3.0	IV	Viewed from State Highway 52 as fg/mg. Contrasts in addition of form and line elements of transmission line, and form, line, color, and textural changes in vegetation removal.
110.0M-114.0M and 112.0M-112.5M	1.0 2.0 .5	IV II II	Viewed from State Highway 52 and local ranches as fg/mg. Contrasts in form and line with near-natural landscape.
135.0M-143.0M	8.0	III	Viewed from State Highway 12 and local ranch headquarters as fg/mg. Contrasts in form and line elements of the transmission line would dominate the near-natural landscape surrounding the plains of San Agustin.

<sup>1</sup>All visual resource impacts would be caused by adding transmission towers and conductors to the landscape, unless otherwise noted.

<sup>2</sup>See Appendix 5 of the draft MFPA/EIS for definitions of terms.

<sup>3</sup>All impacts would last for the life of the project--until the transmission line was removed.

Distance zones: fg = foreground; mg = middleground; bg = background;  
fg/mg = foreground/middleground.

TABLE 5  
AREAS REQUIRING MORE INTENSIVE RECLAMATION  
AND EROSION CONTROL  
PROPOSED ACTION MODIFICATIONS

Milepost	Extent Miles (Acres)	Slopes (15% +)	Unfavorable Soils Properties*	Other
<u>Monticello Modification</u>				
47.8M-48.7M	0.9	X	X	
49.1M-49.4M	0.3	X	X	Drainageway Sideslope
54.6M-54.8M	0.2	X	X	
55.1M-55.2M	0.2	X	X	
56.2M-56.5M	0.3	X	X	
63.0M-63.7M	0.7	X	X	
63.9M-64.3M	0.4	X	X	Drainageway Sideslopes
64.6M-65.4M	0.8	X	X	
66.0M-66.8M	0.8	X	X	
72.4M-72.6M	0.2	X	X	
72.9M-73.0M	0.1	X	X	
80.5M-80.7M	0.2	X	X	
81.2M-81.3M	0.1	X	X	
83.3M-83.6M	0.3	X	X	
84.7M-84.9M	0.2	X	X	
85.6M-85.7M	0.1	X	X	
87.8M-87.9M	0.1	X	X	
88.0M-88.1M	0.1	X	X	
88.6M-88.8M	0.2	X	X	
89.0M-89.3M	0.3	X	X	
89.4M-89.5M	0.1	X	X	
90.0M-90.3M	0.3	X	X	
91.0M-91.2M	0.2	X	X	
92.1M-92.7M	0.6	X	X	
93.9M-95.0M	1.1	X	X	
95.1M-95.5M	0.3	X	X	
95.9M-96.0M	0.1	X	X	
97.0M-99.6M	2.6	X	X	
99.8M-100.2M	0.4	X	X	
103.7M-104.1M	0.4	X	X	
104.5M-106.9M	2.4	X	X	
108.2M-108.4M	0.2	X	X	
108.8M-109.0M	0.2	X	X	
109.5M-109.8M	0.3	X	X	
110.2M-110.6M	0.4	X	X	
111.0M-111.6M	0.6	X	X	
<u>Very Large Array Modification</u>				
140.6M-141.8M	1.2	X	X	
141.7M-141.9M	0.2	X	X	Escarpment
148.7M-148.8M	0.2	X	X	
149.3M-149.5M	0.2	X	X	
152.2M-152.4M	0.2	X	X	
153.1M-153.2M	0.1	X	X	
156.8M-158.1M	0.3	X	X	
157.8M-158.1M	0.3	X	X	Escarpment
159.9M-160.0M	0.1	X	X	
160.4M-160.8M	0.4	X	X	
161.0M-161.2M	0.2	X	X	
161.4M-161.5M	0.1	X	X	
161.9M-162.0M	0.1	X	X	
162.1M-162.3M	0.2	X	X	
162.6M-163.3M	0.7	X	X	
163.9M-164.5M	0.6	X	X	
TOTAL:	21.8 (65 Acres)			

Source. Table prepared from soils-terrain analysis and orthophotograph interpretations. Milepost locations are approximate, based on general, preliminary right-of-way information.

\*Unfavorable soil properties:

- shallow over bedrock
- underlain by hard bedrock
- sandy loam sand and clay textured surface and subsoil layers
- containing more than 35 percent coarse fragments by volume, exceeding sizes of 3 inches in diameter
- permeability less than 0.6 inch per hour
- water table less than 72 inches below surface
- soil reaction with pH value greater than 8.5, salinity more than 16 millimhos in the upper 40 inches

These soils will require more intensive reclamation and erosion control.

Since the modifications would occur mainly in creosote bush, mountain shrub, and pinyon-juniper, forage loss would be slightly less than on the original locations. Table 6 shows the numbers of ranch headquarters, dwellings, and livestock watering facilities within 250 feet of the modified portions of the proposed transmission line route.

#### Terrestrial Wildlife

The Monticello modification would temporarily disturb 198 acres of mule deer habitat. The habitats disturbed for all other big game species, turkeys, and quail would be the same as the original Proposed Action location. The VLA modifications would disturb the same amount and types of habitat as the original Proposed Action, described in the draft MFPA/EIS. Impacts to wildlife habitats and populations would be the same as described in the draft MFPA/EIS--short-term and insignificant.

#### **THE VERY LARGE ARRAY ALTERNATIVE (A)**

##### Modifications

The Very Large Array Alternative (A) as described in the draft MFPA/EIS has been modified in two locations: (1) Monticello Canyon and (2) Horse Springs. These modifications would change the length of the alternative by more than 2.5 miles and less than 3.5 miles respectively, for a total change of less than 1 mile. Figure 2 shows the differences between the original and modified routes. (See Modified Map 1-2, Section 3, for changes along the alternative route.) With these modifications, the alternative would be 214 miles long, disturb 642 acres, and cost about

\$34,338,000 to build. This alternative would cross 61 miles of public land. (See Modified Map 1-2, Section 3, for land ownership chart.)

The Monticello Canyon route modification would be 2.5 miles longer than the original alternative and the same as described for the Proposed Action modifications.

The Horse Springs modification would start at about MP 151A of the original alternative route, head north, then northwest, until it intersected the original alternative route at MP 169A. The route is mileposted from 151A to 165.5 MA and would be 3.5 miles less than the original sections (Modified Map 1-2). Construction of these modifications would be the same as described for the Proposed Action in the draft MFPA/EIS.

##### Affected Environment and Environmental Consequences

Impacts to electromagnetic interference and effects, wilderness, recreation, socioeconomic, transportation networks, and air quality from the Very Large Array Alternative modifications would be the same as described for the original Very Large Array Alternative (A) in the draft MFPA/EIS. Impacts to cultural resources would be of the same type described for the modified Proposed Action.

##### **Visual Resources**

The affected environment for the Monticello and Horse Springs modifications is similar to the portions of the original alternative they replace. (Table 7 shows the VRM classes that would be affected by the modifications.) Together, the

TABLE 6

**DISTANCE OF PROPOSED ACTION MODIFICATIONS FROM RANCH HEADQUARTERS,  
DWELLINGS, AND LIVESTOCK WATERING FACILITIES<sup>1</sup>**

Milepost	Distance to Ranch Headquarters and Dwellings (Ft) <sup>2</sup>	Distances to Livestock Watering Facilities (Ft) <sup>3</sup>	Additional Notes
<u>Monticello Modification</u>			
54.8M	500-1,000		
56.9M		0-250*	Cup Tank
68.2M		0-250*	Pond
76.1M	1,000+		
99.7M		250-500	Spring Canyon Well
<u>Very Large Array Modification</u>			
134.6M	500-1,000		Sanchez Ranch Headquarters
141.2M		500-1,000	Aqua Fria Well
146.6M		250-500	Aqua Fria Well
154.9M		250-500	Spring
159.2M		500-1,000	Well

Source: Locations of ranch headquarters, dwellings, and water facilities recorded from the latest Geological Survey topographic maps, scale 1:24,000, supplemented with BLM and local land status maps.

\*Facilities occurring within the 250-foot distance of concern.

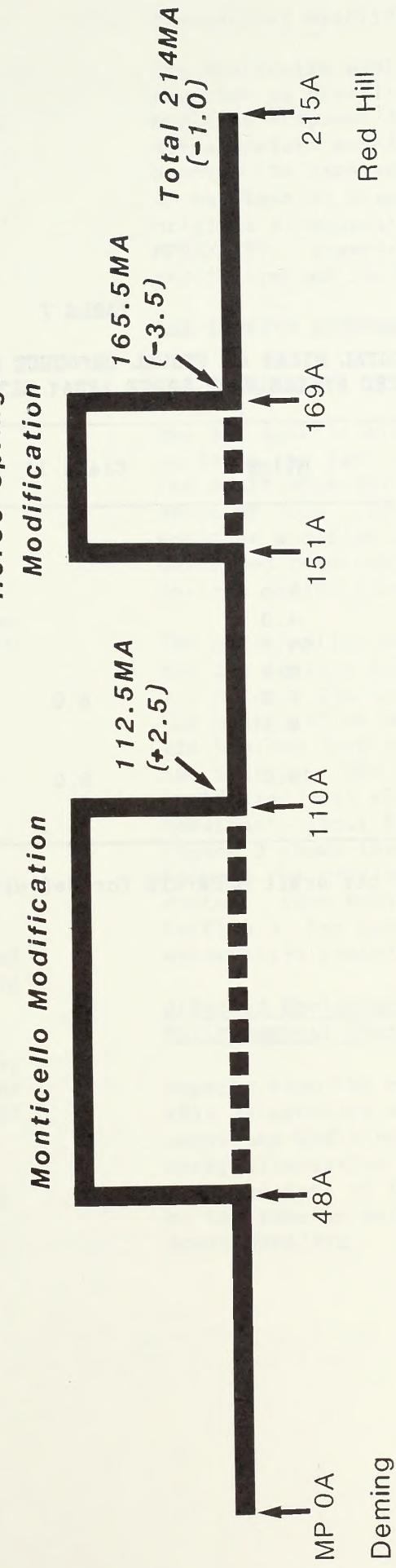
<sup>1</sup>Includes ranch headquarters, dwellings, and livestock watering facilities within 1,000 feet of the transmission line.

<sup>2</sup>Includes livestock watering facilities when associated with the ranch headquarters and dwellings.

<sup>3</sup>Includes livestock watering facilities (tank, pond, and windmill) not associated with ranch headquarters.

**Original Mileposts:** 0-48A  
110A-151A  
169A-215A

**New Mileposts:** 48A-112.5MA  
151A-165.5MA  
169A-215A



214 miles (3 acres per mile) equals 642 total acres disturbed

FIGURE 2 MODIFIED VERY LARGE ARRAY ALTERNATIVE

TABLE 7

TOTAL MILES OF VISUAL RESOURCE MANAGEMENT CLASSES  
AFFECTED BY THE VERY LARGE ARRAY ALTERNATIVE MODIFICATIONS

Milepost	Miles	Class II	Class III	Class IV
48.0MA- 49.0MA	1.0			1.0
49.0MA- 53.0MA	4.0		4.0	
53.0MA-112.0MA	59.0			59.0
112.0MA-112.5MA	0.5		0.5	
151.0MA-157.0MA	6.0	6.0		
157.0MA-165.5MA	8.5			8.5
TOTAL:	79.0	6.0	4.5	68.5

See Appendix 5 of the draft MFPA/EIS for definitions of terms.

modifications would cross 6 miles of VRM Class II areas, 4.5 miles of VRM Class III areas, and 68.5 miles of VRM Class IV. See Table 8 for significant adverse impacts caused by the modifications.

#### **Soils and Vegetation**

The affected environment for the Monticello and Horse Springs modifications is similar to the portions of the original alternative they replace.

The Monticello and Horse Springs modifications would cross 20.2 miles (61 acres) of soils and terrain most susceptible to impacts. See Table 9 for the locations and extent of these sensitive areas. The modifications would disturb the same types of vegetation with the same impacts as described in the draft MFPA/EIS.

#### **Livestock Grazing**

The affected environment for the Monticello and Horse Springs modifications is similar to the portions of the original alternative route they replace.

Since the modifications would occur mainly in creosote bush and pinyon-juniper, forage loss would be slightly less than on the original locations. The number of ranch headquarters, dwellings, and livestock watering facilities within 250 feet of the Monticello modification are shown on Table 6. No ranch headquarters, dwellings, or livestock watering facilities would occur within 1,000 feet of the Horse Springs modification.

#### **Terrestrial Wildlife**

The Monticello modification is the same as described for the modified Proposed Action. The Horse Springs modification would disturb the same amount and type of habitats as described for the original alternative (draft MFPA/EIS). Impacts would be short term and insignificant.

#### **SAN AGUSTIN ALTERNATIVE (B)**

##### **Modifications**

The San Agustin Alternative (B) would be the same as described in the draft MFPA/EIS from MP 0 to about MP 165B. From there, it would be modified the same as described previously as the Horse Springs modification.

The modification would shorten the San Agustin Alternative by 3.5 miles. The alternative with the modification would now be 224.5 miles long and disturb 706.5 acres. The alternative would also cost slightly less to construct--about \$42,385,000. Figure 3 shows the differences between the original and modified routes. (See Modified Map 1-2, Section 3, for changes along the alternative route).

##### **Affected Environment and Environmental Consequences**

Impacts from the modifications of this alternative were analyzed under the Modified Very Large Array Alternative (A). Impacts from the rest of the route would be the same as analyzed in the draft MFPA/EIS.

TABLE 8

**SIGNIFICANT ADVERSE IMPACTS TO VISUAL RESOURCES  
FROM THE VERY LARGE ARRAY ALTERNATIVE MODIFICATIONS<sup>1</sup>**

Milepost	Miles	Existing VRM Class <sup>2</sup>	Primary Viewpoints and Description of Impacts <sup>3</sup>
51.0MA-55.0MA	3.0	III	Viewed from State Highway 90 as fg/mg. Would add elements of form and line to natural-appearing landscape.
	1.0	IV	
71.0MA-74.0MA	3.0	IV	Viewed from State Highway 52 and community of Winston as fg/mg. Contrasts in addition of form and line elements of transmission line, and form, line, color, and textural changes in vegetation removal.
151A-159.5MA	8.5	II	Viewed from State Highway 12, local roads, ranch headquarters, Community of Horse Springs, and the Continental Divide and Horse Springs WSAs as fg/mg. Contrasts in elements of form and line of the transmission line towers and conductors with the natural appearing landscape would attract attention and create a dominant feature in terms of scale in the Plains of San Agustin.

<sup>1</sup>All visual resource impacts would be caused by adding transmission towers and conductors to the landscape, unless otherwise noted.

<sup>2</sup>See Appendix 5 of the draft MFPA/EIS for definitions of terms.

<sup>3</sup>All impacts would last for the life of the project--until the transmission line was removed.

Distance zones: fg = foreground; mg = middleground; bg = background;  
fg/mg = foreground/middleground.

TABLE 9

AREAS REQUIRING MORE INTENSIVE RECLAMATION  
AND EROSION CONTROL  
VERY LARGE ARRAY ALTERNATIVE MODIFICATIONS

Milepost	Extent Miles (Acres)	<u>SENSITIVE AREA DESCRIPTION AND COMMENTS</u>		
		Slopes (15% +)	Unfavorable Soils Properties*	Other
<u>Monticello Modification</u>				
(Same as Proposed Action)	16.9			
<u>Horse Springs Modification</u>				
151.3MA-151.4MA	0.1	X	X	
152.5MA-152.7MA	0.2	X	X	
154.5MA-155.2MA	0.7	X	X	
157.0MA-157.2MA	0.2	X	X	
157.5MA-157.6MA	0.9	X	X	
158.0MA-158.2MA	0.2	X	X	
158.7MA-159.5MA	0.8	X	X	Very Steep Canyon
160.8MA-161.2MA	0.4	X	X	
161.5MA-161.7MA	0.2	X	X	
161.9MA-162.0MA	0.1	X	X	
162.4MA-162.6MA	0.2	X	X	
163.1MA-163.8MA	0.7	X	X	
164.6MA-165.0MA	0.6	X	X	
Subtotal:	3.3			
TOTAL:	20.2 (61 acres)			

Source: Table prepared from soils-terrain analysis and orthophotograph interpretations. Milepost locations are approximate, based on general, preliminary right-of-way information.

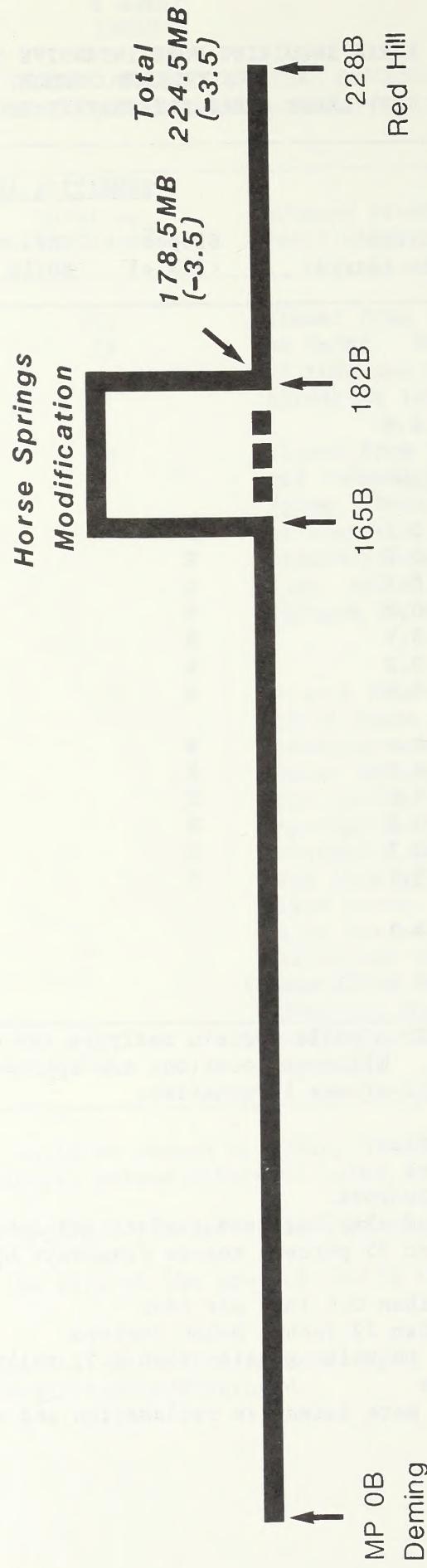
\*Unfavorable soil properties:

- shallow over bedrock
- underlain by hard bedrock
- sandy, loam sand and clay textured surface and subsoil layers
- containing more than 35 percent coarse fragments by volume, exceeding sizes of 3 inches in diameter
- permeability less than 0.6 inch per hour
- water table less than 72 inches below surface
- soil reaction with pH value greater than 8.5, salinity more than 16 millimhos in the upper 40 inches

These soils will require more intensive reclamation and erosion control.

**Original Mileposts:** 0B-165B  
182B-228B

**New Mileposts:** 165B-178.5MB  
182B-228B



*224.5 miles (3 acres per mile) equals 706.5 total acres disturbed*

**FIGURE 3 MODIFIED SAN AGUSTIN ALTERNATIVE**

## **SECTION 3**

### **Modifications and Corrections to the Draft Management Framework Plan Amendment/ Environmental Impact Statement**



MODIFICATIONS AND CORRECTIONS TO THE DRAFT MANAGEMENT FRAMEWORK PLAN  
AMENDMENT/ENVIRONMENTAL IMPACT STATEMENT (MFPA/EIS)

Based on (1) comments received on the draft MFPA/EIS during the public review process and (2) changes resulting from modifications to the Proposed Action and Very Large Array Alternative routes, the following revisions have been made. This section also incorporates

corrections of errors made during the printing of the draft MFPA/EIS. Some of these revisions were already sent to all reviewers of the draft MFPA/EIS. Specific text changes follow. Additions or changes to tables and to Map 1-2 are included as the final part of this section.

TEXT CORRECTIONS

PAGE	COL.	PARA.	LINE	IS:	SHOULD BE:
18	R	Partial	7	near	nearby
19	L	Partial	5	The VLA operates at frequencies of 1.5, 4.5, 14, and 22 gigahertz (GHz), and equipment for 327 meahertz (MHz) operation is now being installed. By 1986, the VLA will also be able to operate at 75 MHz.	The VLA operates at frequencies of 1.5, 4.9, 14.9, and 22 gigahertz (GHz), and equipment for operation at 75 and 327 megahertz (MHz) and 8.4 GHz is now being installed
33	L	3	1	geological	mineral
34	R	1	6	These antennas, like those of the VLA, would also be able to operate at 75 MHz.	The VLBA antenna would be 82 feet in diameter and would operate at 75, 327, and 610 MHz and at 1.5, 2.3, 4.9, 6.1, 8.4, 10.7, 14.9, 22, 43, and 86 GHz.
34	L	4	1	The VLA presently operates at frequencies of 1.5, 4.5, 14, and 22 gigahertz (GHz). Equipment for 327 MHz operation is being installed	The VLA presently operates at frequencies of 1.5, 4.9, 14.9, and 22 gigahertz (GHz). Equipment for operation at 75 and 327 MHz and 8.4 GHz is being installed.
52	R	1	4-5	-total employment or per capita personal income of a county;	-population, total employment, or per capita personal income of a county;
63	L	4	2	would be -75 dBW/m <sup>2</sup> Hz	would be -275 dBW/m <sup>2</sup> Hz
72	L	1	5	Table 2-16 The Very Array Alternative would affect...	The Very Large Array Alternative would affect...
123	L	5	1-2	Conductors and insulators will be treated to be non-reflective.	Conductors and insulators will be treated to be non-reflective unless otherwise approved by the authorizing officer.
124	R	1	7	If the first reseeding is not successful as determined by the District Manager, one additional attempt will be required.	If the first reseeding is not successful as determined by the District Manager, additional attempts will be made until permanent ground cover can be established.

PAGE	COL.	PARA.	LINE	IS:	SHOULD BE:
124	L	6	1	(1) selecting alternate routes to avoid dense vegetation or using selective cleaning procedures after consultation with the BLM or land manager/owner; and...	(1) selecting alternate routes to avoid dense vegetation or using clearing procedures after consultation with the BLM or land manager/owner, Fish and Wildlife Service, and the New Mexico Department of Game and Fish; and...
125	L	4	10	N/A	<u>Add:</u> Surveys for nesting raptors should be conducted before construction so that during the critical period. Construction activities should take place only between July 1 and January 31 in raptor areas unless other dates are approved by the authorized officer.
Appendix 3				State of New Mexico, Natural Resources Department Letter	<u>Add</u> the following species to the list of state taxa of concern: <u>Silene wrighti</u> , <u>Erigeron copulinus</u> , <u>Pteryxia davidsonii</u> .

## TABLE REVISIONS

(Revised)  
TABLE 2-1TOTAL MILES OF VISUAL RESOURCE MANAGEMENT CLASSES  
AFFECTED BY THE PROPOSED ACTION

Milepost	Miles	Class II	Class III	Class IV
0.0- 7.5	7.5		7.5	
7.5- 9.5	2.0	2.0		
9.5- 12.0	2.5			2.5
12.0- 13.5	1.5	1.5		
13.5- 29.0	15.5		15.5	
29.0- 33.0	4.0	4.0		
33.0- 48.0	15.0			15.0
48.0M- 49.0M	1.0			1.0
49.0M- 53.0M	4.0		4.0	
53.0M-112.0M	59.0			59.0
112.0M-114.0M	2.0		2.0	
112.0-112.5	.5		.5	
112.5-115.5	3.0			3.0
115.5-122.0	6.5	6.5		
122.0M-136.0M	14.0	14.0		
136.0M-143.0M	7.0		7.0	
143.0M-165.5M	22.5			22.5
157.0-162.5	5.5			5.5
162.5-169.5	7.0		7.0	
169.5-182.0	12.5			12.5
182.0-183.0	1.0		1.0	
183.0-185.5	2.5			2.5
185.5-189.0	3.5		3.5	
189.0-191.0	2.0			2.0
191.0-195.0	4.0		4.0	
195.0-199.0	4.0			4.0
199.0-200.0	1.0		1.0	
200.0-203.0	<u>3.0</u>	—	—	<u>3.0</u>
(End)				
TOTAL:	213.5	28.0	53.0	132.5

See Appendix 5, draft MFPA/EIS, for definitions of terms.

SIGNIFICANT ADVERSE VISUAL RESOURCE IMPACTS CAUSED  
BY THE PROPOSED ACTION<sup>1</sup>

Milepost	Miles	Existing VRI Class <sup>2</sup>	Primary Viewpoints and Description of Impacts <sup>3</sup>
0-3.5	3.5	III	Viewed from U.S. Highway 180, State Highway 26, rural residences as fg/mg. Would add to cumulative impacts of existing transmission line.
7.5-9.5	2.0	II	Viewed from State Highway 26, local access to ranches and mines as fg/mg. Addition of new structure in natural-appearing landscape would cause contrast in form and line elements.
25-31	2.0 4.0	II III	Viewed from State Highway 27 as fg/mg. Would add elements of form and line to natural-appearing landscape.
51.0M-55.0M	3.0 1.0	III IV	Viewed from State Highway 90 as fg/mg. Would add elements of form and line to natural- appearing landscape.
71.0M-74.0M	3.0	IV	Viewed from State Highway 52 as fg/mg. Contrasts in addition of form and line elements of transmission line, and form, line, color, and textural changes in vegetation removal.
110.0-114.0M and 112.0-112.5	1.0 2.0 .5	IV II II	Viewed from State Highway 52 and local ranches as fg/mg. Contrasts in form and line with near-natural landscape.
115.5-119.5	.5 3.5	II IV	Viewed from State Highway 78, and local ranch headquarters as fg/mg and bg. Contrasts in form and line elements of the transmission line would dominate the near-natural landscape.
135.0M-143.0M	8.0	III	Viewed from State Highway 12 and local ranch headquarters as fg/mg. Contrasts in form and line elements of the transmission line would dominate the near- natural landscape surrounding the plains of Sen Agustin.
MP 163-167	4.0	III	Viewed from county road along Mengus Creek as fg/mg. Contrasts in elements of form and line, would dominate the existing landscape in terms of scale.

<sup>1</sup>All visual resource impacts would be caused by adding transmission towers and conductors to the landscape, unless otherwise noted.<sup>2</sup>Refer to Appendix 5, draft MFPA/EIS, for definitions of terms.<sup>3</sup>All impacts would last for the life of the project--until the transmission line is removed.

Distance zones: fg = foreground; mg = middleground; bg = background;  
fg/mg = foreground/middleground.

(Revised)  
TABLE 2-3

AREAS REQUIRING MORE INTENSIVE RECLAMATION  
AND EROSION CONTROL: PROPOSED ACTION

Milepost	Miles (Acres)	<u>SENSITIVE AREA DESCRIPTION AND COMMENTS</u>		
		Slopes (15% +)	Unfavorable Soils Properties*	Other
0.0-4.0	4.0		X	Sandy Soils, (Coppice Dunes)
11.0-11.3	0.3	X	X	
13.0-13.3	0.3	X	X	
37.4-38.4	1.0	X	X	
38.7-39.0	0.3	X	X	Drainageway
40.4-40.8	0.4	X	X	Drainageway
42.3-43.6	1.3	X	X	
45.9-47.1	1.2	X	X	Drainageway
47.8M-48.7M	0.9	X	X	
49.1M-49.4M	0.1	X	X	
54.6M-54.8M	0.2	X	X	
55.1M-55.2M	0.1	X	X	
56.2M-56.5M	0.3	X	X	
63.0M-63.7M	0.7	X	X	
63.9M-64.3M	0.4	X	X	Drainageway Sideslope
64.6M-65.4M	0.8	X	X	
66.0M-66.8M	0.8	X	X	
72.4M-72.6M	0.2	X	X	
72.9M-73.0M	0.1	X	X	
80.5M-80.7M	0.2	X	X	
81.2M-81.3M	0.1	X	X	
83.3M-83.6M	0.3	X	X	
84.7M-84.9M	0.2	X	X	
85.6M-85.7M	0.1	X	X	
87.8M-87.9M	0.1	X	X	
88.0M-88.1M	0.1	X	X	
88.6M-88.8M	0.2	X	X	
89.0M-89.3M	0.3	X	X	
89.4M-89.5M	0.1	X	X	
90.0M-90.3M	0.3	X	X	
91.0M-91.2M	0.2	X	X	
92.1M-92.7M	0.6	X	X	
93.9M-95.0M	1.1	X	X	
95.1M-95.4M	0.3	X	X	
95.9M-96.0M	0.1	X	X	
97.0M-99.6M	2.6	X	X	
99.8M-100.2M	0.4	X	X	
103.7M-104.1M	0.4	X	X	
104.5M-106.9M	2.4	X	X	
108.2M-108.4M	0.2	X	X	
108.8M-109.0M	0.2	X	X	
109.5M-109.8M	0.3	X	X	
110.2M-110.6M	0.4	X	X	
111.0M-111.6M	0.6	X	X	

(Revised)  
TABLE 2-3

AREAS REQUIRING MORE INTENSIVE RECLAMATION  
AND EROSION CONTROL: PROPOSED ACTION

Milepost	Miles (Acres)	<u>SENSITIVE AREA DESCRIPTION AND COMMENTS</u>		
		Slopes (15% +)	Unfavorable Soils Properties*	Other
112.0-112.1	0.1	X	X	
112.3-112.8	0.5	X	X	
140.6M-141.8M	1.2	X	X	
141.7M-141.9M	0.2	X	X	Escarpmment
148.7M-148.8M	0.1	X	X	
149.3M-149.5M	0.2	X	X	
152.2M-152.4M	0.2	X	X	
153.1M-153.2M	0.1	X	X	
156.8M-157.0M	0.2	X	X	
157.8M-158.1M	0.3	X	X	Escarpmment
159.9M-160.0M	0.1	X	X	
160.4M-160.8M	0.4	X	X	
161.0M-161.2M	0.2	X	X	
161.4M-161.5M	0.1	X	X	
161.9M-162.0M	0.1	X	X	
162.1M-162.3M	0.2	X	X	
162.6M-163.3M	0.7	X	X	
163.9M-164.5M	0.6	X	X	
169.5-169.7	0.2	X	X	Drainageway
169.9-171.2	0.3	X	X	
173.4-173.6	0.2	X	X	Drainageway
174.0-174.7	0.7	X	X	Drainageway
178.0-178.9	0.9	X	X	Drainageway
179.9-180.1	0.2	X	X	Escarpmment
199.9-201.0	<u>1.1</u>	X	X	
<b>TOTAL:</b>	<b>34.8 (104 acres)</b>			

Source: Table prepared from soils-terrain analysis and orthophotograph interpretations. Milepost locations are approximate, based on general, preliminary right-of-way information.

\*Unfavorable soil property parameters:

- shallow over bedrock
- underlain by hard bedrock
- sandy loam sand and clay textured surface and subsoil layers
- containing more than 35 percent coarse fragments by volume, exceeding sizes of 3 inches in diameter
- permeability less than 0.6 inch per hour
- water table less than 72 inches below surface
- soil reaction with pH value greater than 8.5, salinity more than 16 millimhos in the upper 40 inches

These soils will require more intensive reclamation and erosion control.

(Revised)  
TABLE 2-5

DISTANCE OF THE PROPOSED ACTION FROM RANCH HEADQUARTERS,  
DWELLINGS, AND LIVESTOCK WATERING FACILITIES<sup>1</sup>

Milepost	Distance to Ranch Headquarters and Dwellings (Ft) <sup>2</sup>	Distances to Livestock Watering Facilities (Ft) <sup>3</sup>	Additional Notes
0.3	250-500		
0.4	0-250*		
1.6		0-250*	
27.9		250-500	Windmill
30.9		250-500	Windmill
33.7	500-1,000		Ranch Hq
54.8M	500-1,000		
56.9M		0-250*	Cup Tank
68.2M		0-250*	Pond
76.1M	1,000+		
99.7M		250-250	Spring Canyon
117.0		0-250*	Well
134.6M	500-1,000		Well
141.2M		500-1,000	Sanchez Ranch
146.6M		250-500	Headquarters
154.9M		250-500	Aqua Fria Well
159.2M		500-1,000	Aqua Fria Well
159.2M			Spring
159.2M			Well
157.3	500-1,000		Dwelling
170.0		250-500	Windmill
176.3		250-500	Windmill

Source: Locations of ranch headquarters, dwellings, and water facilities recorded from the latest U.S. Geological Survey topographic maps, scale 1:24,000, supplemented with BLM and local land status maps.

\*Facilities occurring within the 250-foot distance of concern.

<sup>1</sup>Includes ranch headquarters, dwellings, and livestock watering facilities within 1,000 feet of the transmission line.

<sup>2</sup>Includes livestock watering facilities when associated with the ranch headquarters and dwellings.

<sup>3</sup>Includes livestock watering facilities (tank, pond, and windmill) not associated with ranch headquarters.

(Revised)  
TABLE 2-10

## WILDLIFE SPECIES AND HABITATS AFFECTED BY THE PROPOSED ACTION

Wildlife Species	Miles of Occupied Habitat	Crucial Habitats	Habitat Trends <sup>1</sup>	Population Estimate	Population Trend	Acres of Habitat Temporarily Disturbed <sup>2</sup>
<u><b>Mule Deer</b></u>						
MP 10-12	2	None	stable (4)	1.00 deer/Sec.	increasing	6
MP 67M-95M	30	None	stable (5)	3.00 deer/Sec.	decreasing	90
MP 95-117	22	None	stable (4)	0.75 deer/Sec.	decreasing	66
MP 117-123	6	None	stable (3)	0.30 deer/Sec.	decreasing	18
MP 137-203	<u>66</u>	Winter Range (MP 175-178)	stable (5)	0.70 deer/Sec.	decreasing	<u>198</u>
TOTAL:	126					378
<u><b>Pronghorn</b></u>						
MP 14-21	7	None	stable (5)	75	stable	21
MP 96-138	<u>42</u>	None	stable (1)	125	decreasing	<u>126</u>
TOTAL:	49					147
<u><b>Black Bear</b></u>						
MP 87-117	30	None	stable	100	stable	90
MP 140-160	20	None	stable	20	stable	60
MP 168-177	<u>9</u>	None	stable	50	decreasing	<u>27</u>
TOTAL:	59					177
<u><b>Javelina</b></u>						
MP 0-93	93	None	stable	2,500	increasing	279
MP 138-144	<u>6</u>	None	stable	25	stable	<u>18</u>
TOTAL:	99					297
<u><b>Turkey</b></u>						
MP 88-109	21		stable	2,000	increasing	63
MP 174-190	<u>16</u>					<u>48</u>
TOTAL:	37					111
<u><b>Quail</b></u>						
MP 0-80	80		stable	not calculated	stable	240

Source: Based on the wildlife distribution, population estimates, and habitat classifications on computerized maps furnished by the Technology Application Center, University of New Mexico, using data from the New Mexico Department of Game and Fish (current as of July 1982).

<sup>1</sup>The numbers in parentheses are judgmental ratings from the New Mexico Department of Game and Fish of the quality of the occupied habitat ranging from 1 to 10 (1 = the lowest possible quality; 10 = the highest).

<sup>2</sup>These are areas of habitat that would be temporarily disturbed and then revegetated. Revegetation is expected to be complete in 3 to 5 years.

(Revised)  
TABLE 2-11

TOTAL MILES OF VISUAL RESOURCE MANAGEMENT CLASSES  
AFFECTED BY THE VERY LARGE ARRAY ALTERNATIVE (A)

Milepost	Miles	Class II	Class III	Class IV
0.0A- 7.5A	7.5		7.5	
7.5A- 9.5A	2.0	2.0		
9.5A-12.0A	2.5			2.5
12.0A-13.5A	1.5	1.5		
13.5A-29.0A	15.5		15.5	
29.0A-33.0A	4.0	4.0		
33.0A-48.0A	15.0			15.0
48.0MA- 49.0MA	1.0			1.0
49.0MA- 53.0MA	4.0		4.0	
53.0MA-112.0MA	59.0			59.0
112.0MA-112.5MA	.5		0.5	
110.0MA-111.0MA	1.0			1.0
111.0A-117.5A	6.5			6.5
117.5A-124.0A	6.5	6.5		
124.0A-130.0A	6.0			6.0
130.0A-151.0A	21.0	21.0		
151.0MA-157.0MA	6.0	6.0		
157.0MA-165.5MA	8.5			8.5
169.0A-174.0A	5.0			5.0
174.0A-181.0A	7.0		7.0	
181.0A-192.5A	11.5			11.5
192.5A-193.5A	1.0		1.0	
193.5A-196.0A	2.5			2.5
196.0A-200.0A	4.0		4.0	
200.0A-202.5A	2.5			2.5
202.5A-206.5A	4.0		4.0	
206.5A-210.5A	4.0			4.0
210.5A-211.5A	1.0		1.0	
211.5A-215.0A	<u>3.5</u>	<u>—</u>	<u>—</u>	<u>3.5</u>
(End)				
<b>TOTAL:</b>	<b>214.0</b>	<b>41.0</b>	<b>44.5</b>	<b>128.5</b>

See Appendix 5, draft MFPA/EIS, for definitions of terms.

(Revised)  
TABLE 2-12

SIGNIFICANT ADVERSE VISUAL RESOURCE IMPACTS CAUSED BY  
THE VERY LARGE ARRAY ALTERNATIVE (A)<sup>1</sup>

Milepost	Miles	Existing VRM Class <sup>2</sup>	Primary Viewpoints and Description of Impacts <sup>3</sup>
0.0A-3.5A	3.5	III	Viewed from U.S. Highway 180, State Highway 26, rural residences as fg/mg. Would add to cumulative impacts of existing transmission line.
7.5A-9.5A	2.0	II	Viewed from State Highway 26, local access to ranches and mines as fg/mg. Addition of new structure in natural-appearing landscape would cause contrast in form and line elements.
25A-31A	2.0 4.0	II III	Viewed from State Highway 27 as fg/mg. Would add elements of form and line to natural-appearing landscape.
51.0M-55.0M	3.0 1.0	III IV	Viewed from State Highway 90 as fg/mg. Would add elements of form and line to natural appearing landscape.
71.0M-74.0M	3.0	IV	Viewed from State Highway 52 and community of Winston as fg/mg. Contrasts in addition of form and line elements of transmission line, and form, line, color, and textural changes in vegetation removal.
138A-151A and 151A-159.5MA	21.5	II	Viewed from State Highway 12, local roads, ranch headquarters, Community of Horse Springs, and the Continental Divide and Horse Springs WSAs as fg/mg. Contrasts in elements of form and line of the transmission line towers and conductors with the natural appearing landscape would attract attention and create a dominant feature in terms of scale in the Plains of San Agustin.
174.5A-178.5A	4.0	III	Viewed from county road along Mangus Creek as fg/mg. Contrasts in elements of form and line would dominate the existing landscape in terms of scale.

<sup>1</sup>All visual resource impacts would be caused by adding transmission towers and conductors to the landscape, unless otherwise noted.

<sup>2</sup>See Appendix 5, draft MFPA/EIS, for definitions of terms.

<sup>3</sup>All impacts would last for the life of the project--until the transmission line is removed.

Distance zones: fg = foreground; mg = middleground; bg = background;  
fg/mg = foreground/middleground.

(Revised)  
TABLE 2-13

AREAS REQUIRING MORE INTENSIVE RECLAMATION  
AND EROSION CONTROL: VERY LARGE ARRAY ALTERNATIVE (A)

<u>SENSITIVE AREA DESCRIPTION AND COMMENTS</u>				
Milepost	Miles (Acres)	Slopes (15% +)	Unfavorable Soils Properties*	Other
0.0A-4.0A	4.0		X	Sandy Soils (Coppice Dunes)
11.0A-11.3A	0.3	X	X	
13.0A-13.3A	0.3	X	X	
37.4A-38.4A	1.0	X	X	
38.7A-39.0A	0.3	X	X	Drainageway
40.4A-40.8A	0.4	X	X	Drainageway
42.3A-43.6A	1.3	X	X	
45.9A-47.1A	1.2	X	X	Drainageway
47.8MA-48.7MA	0.9	X	X	
49.1MA-49.4MA	0.3	X	X	Drainageway Sideslope
54.6MA-54.8MA	0.2	X	X	
55.1MA-55.2MA	0.1	X	X	
56.2MA-56.5MA	0.3	X	X	
63.0MA-63.7MA	0.7	X	X	
63.9MA-64.3MA	0.4	X	X	Drainageway Sideslope
64.6MA-65.4MA	0.8	X	X	
66.0MA-66.8MA	0.8	X	X	
72.4MA-72.6MA	0.2	X	X	
72.9MA-73.0MA	0.1	X	X	
80.5MA-80.7MA	0.2	X	X	
81.2MA-81.3MA	0.1	X	X	
83.3MA-83.6MA	0.3	X	X	
84.7MA-84.9MA	0.2	X	X	
85.6MA-85.7MA	0.1	X	X	
87.5MA-87.9MA	0.1	X	X	
88.0MA-88.1MA	0.1	X	X	
88.6MA-88.8MA	0.2	X	X	
89.0MA-89.3MA	0.3	X	X	
89.4MA-89.5MA	0.1	X	X	
90.0MA-90.3MA	0.3	X	X	
91.0MA-91.2MA	0.2	X	X	
92.1MA-92.7MA	0.6	X	X	
93.5MA-95.0MA	1.1	X	X	
95.1MA-95.4MA	0.3	X	X	
95.9MA-96.0MA	0.1	X	X	
97.0MA-99.6MA	2.6	X	X	
99.8MA-100.2MA	0.4	X	X	
103.7MA-104.1MA	0.4	X	X	
104.5MA-106.9MA	2.4	X	X	
108.2MA-108.4MA	0.2	X	X	
108.8MA-109.0MA	0.2	X	X	
109.5MA-109.9MA	0.2	X	X	
109.5MA-109.8MA	0.3	X	X	
110.2MA-110.6MA	0.4	X	X	
111.0MA-111.6MA	0.6	X	X	
110.8A-111.0A	0.2	X	X	

(Revised)  
TABLE 2-13 (Concluded)

AREAS REQUIRING MORE INTENSIVE RECLAMATION  
AND EROSION CONTROL: VERY LARGE ARRAY ALTERNATIVE (A)

Milepost	Miles (Acres)	<u>SENSITIVE AREA DESCRIPTION AND COMMENTS</u>		
		Slopes (15% +)	Unfavorable Soils Properties*	Other
112.2A-113.2A	1.0	X	X	
116.8A-117.0A	0.2	X	X	Mtn. Sideslope
121.8A-122.8A	1.0	X	X	Mtn. Sideslope
123.6A-124.0A	0.4	X	X	Mtn. Sideslope
131.8A-133.3A	1.5	X	X	Mtn. Sideslope
133.9A-134.1A	0.2	X	X	Drainageway
135.2A-136.2A	0.6	X	X	
136.7A-137.1A	0.4	X	X	
137.8A-138.1A	0.3	X	X	
148.1A-148.3A	0.2	X	X	
149.0A-149.3A	0.3	X	X	
151.3MA-151.4MA	0.1	X	X	
152.5MA-152.7MA	0.2	X	X	
154.5MA-155.2MA	0.7	X	X	
157.0MA-157.2MA	0.2	X	X	
157.5MA-157.6MA	0.9	X	X	
158.0MA-158.2MA	0.2	X	X	
158.7MA-159.5MA	0.8	X	X	Very Steep Canyon
160.8MA-161.2MA	0.4	X	X	
161.5MA-161.7MA	0.2	X	X	
161.9MA-162.0MA	0.1	X	X	
162.4MA-162.6MA	0.2	X	X	
163.1MA-163.8MA	0.7	X	X	
164.6MA-165.0MA	0.6	X	X	
181.5A-181.7A	0.2	X	X	Drainageway
181.9A-182.1A	0.2	X	X	
185.4A-185.6A	0.2	X	X	Drainageway
186.0A-186.7A	0.7	X	X	Drainageway
190.0A-190.9A	0.9	X	X	Drainageway
191.9A-192.0A	0.2	X	X	Escarpment
211.9A-213.0A	1.1	X	X	Volcanic
TOTAL:	39.2 (118 acres)			

Source: Table prepared from soils-terrain analysis and orthophotograph interpretations. Milepost locations are approximate, based on general, preliminary right-of-way information.

\*Unfavorable soil property parameters:

- shallow over bedrock
- underlain by hard bedrock
- sandy, loam sand and clay textured surface and subsoil layers
- containing more than 35 percent coarse fragments by volume, exceeding sizes of 3 inches in diameter
- permeability less than 0.6 inch per hour
- water table less than 72 inches below surface
- soil reaction with pH value greater than 8.5, salinity more than 16 millimhos in the upper 40 inches

These soils will require more intensive reclamation and erosion control.

(revised)  
TABLE 2-15

DISTANCE OF THE VERY LARGE ARRAY ALTERNATIVE (A) FROM RANCH HEADQUARTERS,  
DWELLINGS, AND LIVESTOCK WATERING FACILITIES<sup>1</sup>

Milepost	Distance to Ranch Headquarters and Dwellings (Ft) <sup>2</sup>	Distances to Livestock Watering Facilities (Ft) <sup>3</sup>	Additional Notes
0.3A	250-500		
0.4A	0-250*		
1.6A		0-250*	
27.9A		250-500	
33.7A	500-1,000		Ranch Hq.
54.8MA	500-1,000		
56.9MA		0-250*	Cup Tank
68.2MA		0-250*	Pond
76.1MA	1,000-1,500		Dwelling
99.7MA		250-250	Spring Canyon
169.3A	500-1,000		Well
182.0A		250-500	Dwelling
188.3A		250-500	Windmill
			Windmill

Source: Locations of ranch headquarters, dwellings, and watering facilities recorded from the latest Geological Survey topographic maps, scale 1:24,000, supplemented with BLM and local land status maps.

\*Facilities occurring within the 250-foot distance of concern.

<sup>1</sup>Includes ranch headquarters, dwellings, and livestock watering facilities within 1,000 feet of the transmission line.

<sup>2</sup>Includes livestock watering facilities when associated with the ranch headquarters and dwellings.

<sup>3</sup>Includes livestock watering facilities (tank, pond, and windmill) not associated with ranch headquarters.

**TABLE CORRECTIONS**

TABLE 2-18 (page 75, draft MFPA/EIS)

Milepost	Class II	Class III	Class IV
<u>IS:</u>			
35.0-50.5B	15.5		
120.5-131.5B		11.0	
<u>SHOULD BE:</u>			
35.0B-50.5B			15.5
120.5B-131.5B			11.0

TABLE 2-19 (page 76, draft MFPA/EIS)

Milepost	Primary Viewpoints and Description of Impacts
<u>IS:</u>	
0.0-26.0B	Viewed from U.S. Highway 180, State Highway 26, 21.0 III and rural residences as fg/mg.
26.0-32.0B	Viewed from State Highway 27 as fg/mg. Would add 4.5 III elements of form and line to natural-appearing landscape.
52-56B	Viewed from State Highway 90 as fg/mg. Would add 1.0 IV elements of form and line to natural-appearing landscape.
89-97B	Viewed from State Highways 52 and 59 as fg/mg. 1.5 IV Contrasts in elements of form and line in a natural-appearing landscape.
<u>SHOULD BE:</u>	
0.0B-26.0B	Viewed from U.S. Highway 180, State Highway 26, and rural residences as fg/mg.
26.0B-32.0B	Viewed from State Highway 27 as fg/mg. Would add elements of form and line to natural-appearing landscape.
52B-56B	Viewed from State Highway 90 as fg/mg. Would add elements of form and line to natural-appearing landscape.
89B-97B	Viewed from State Highways 52 and 59 as fg/mg. Contrasts in elements of form and line in a natural-appearing landscape.

TABLE 2-26 (pages 86-87, draft MFPA/EIS)

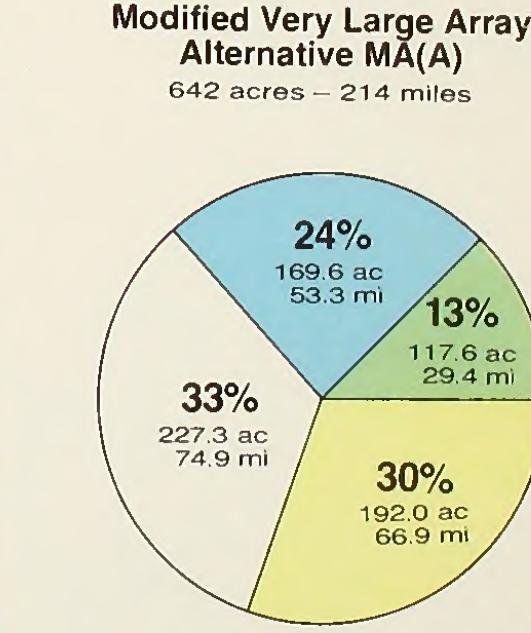
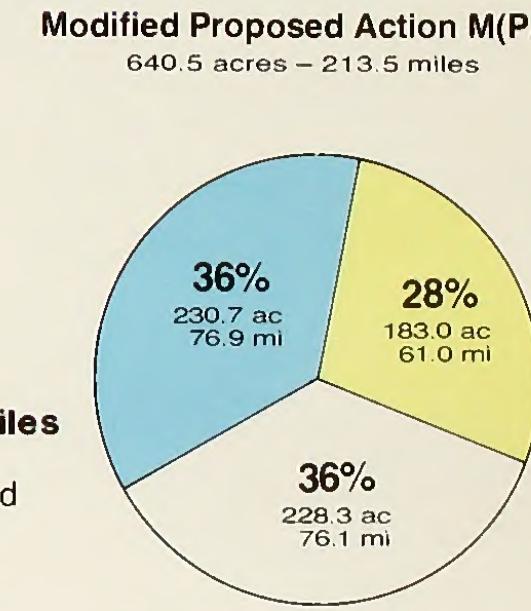
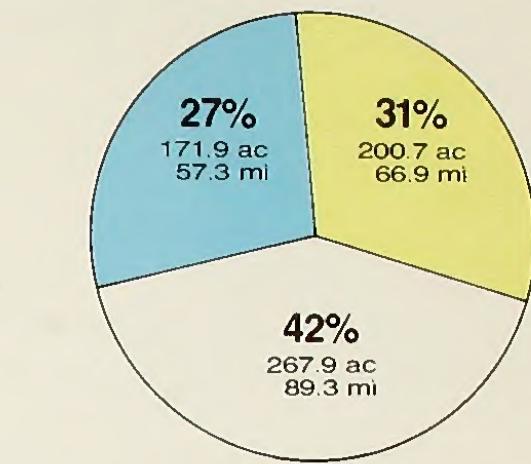
Wildlife Species	Miles of Occupied Habitat	Crucial Habitats	Habitat Trends <sup>1</sup>	Population Estimate	Population Trend	Acres of Temporarily Removed <sup>2</sup>
<u>IS:</u>						
<u>Elk</u>						
MP 99B-109B	10		stable(3)	125	stable	40
MP 111B-121B	10	stable(7)	150	stable	40	
MP 135B-155B	20	decreasing(6)	100	stable	77	
<hr/>						
<b>TOTAL:</b>	<b>40</b>					<b>157</b>
<u>SHOULD BE:</u>						
<u>Elk</u>						
MP 99B-109B	10	None	stable(3)	125	stable	40
MP 111B-121B	10	None	stable(7)	150	stable	40
MP 135B-155B	20	None	decreasing(6)	100	stable	77
<hr/>						
<b>TOTAL:</b>	<b>40</b>					<b>157</b>

TABLE 2-28 (pages 90 and 91, draft MFPA/EIS)

Milepost	Existing VRM Class	Primary Viewpoints Description of Impacts
<u>IS:</u>		
59-77C	III IV	Viewed from U.S. Highway 180, communities of Mangus Springs and Riverside, ranch and other rural residences, and potential candidate river for designation as wild and scenic River (Gila River) as fg/mg. Scale of towers and conductors would dominate landscape. Portions skylighted.
84-87C	III	Viewed from U.S. Highway 180 and State Highway 78 as fg/mg.
119-120C	PR	Viewed from U.S. Highway 180 as fg/mg. Facility elements, would add to cumulative scale...
128-129C	PR	Viewed from State Highway 12 as mg and Bg.
<u>SHOULD BE:</u>		
59C-77C	II IV	Viewed as fg/mg from U.S. Highway 180, communities of Mangus Springs and Riverside, ranches, other rural residences, and Gila River (potential candidate for designation as wild and scenic river). Scale of towers and conductors would dominate landscape. Portions skylighted.
84C-87C	II	Viewed from U.S. Highway 180 and State Highway 78 as fg/mg.
119C-120C	PR	Viewed from U.S. Highway 180 as fg/mg. Facility elements would add to cumulative scale...
128C-129C	PR	Viewed from State Highway 12 as mg and bg.



Route modifications of the Final Management Framework Plan Amendment EIS



Gila Alternative (C) unchanged,  
see Map 1-2 Draft

MAP 1-2M ROUTE MODIFICATIONS TO THE EL PASO TRANSMISSION LINE PROJECT



## **SECTION 4**

### **Consultation and Coordination**



SECTION 4  
CONSULTATION AND COORDINATION

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The Bureau of Land Management (BLM) requested and received consultation from many organizations and individuals, public and private, in developing the draft and final Management Framework Plan

Amendment/Environmental Impact Statements (MFPA/EISs) on the proposed El Paso Electric 345 kV, Springerville to Deming, Transmission Line Project.

#### SCOPING PROCESS

The first step in preparing an MFPA/EIS is to provide opportunities for the public, industry, other federal agencies, and state and local governments to meaningfully participate and comment on the "scope" of the document. The scope of an MFPA/EIS is the range of actions, alternatives, and impacts from building and operating a proposal. The purpose of "scoping" is to determine the significant concerns related to a proposed action that should be included in the MFPA/EIS. The basic goal of scoping is to make the document more concise and meaningful to persons in the Federal Government who must make decisions on the proposal, as well as state and local government and the public who may be affected by approval or disapproval of the proposal (Proposed Action) or its alternatives.

#### Method of Scoping

The Bureau of Land Management (BLM) as lead agency and the Forest Service (U.S. Department of Agriculture) as cooperating agency received 43 written responses concerning the project. Thirty-three commenters addressed

the topics and requested copies of the draft MFPA/EIS. The other 10 had no comments at this time but requested copies of the draft MFPA/EIS.

Comments were received in reply to 150 scoping packages and 1,100 newsletters; presentation of the project by a BLM employee at three Board of County Commission meetings; and numerous contacts with federal, state, county, and city officials, and interested parties. There were about 20 newspaper articles, several radio reports, and one television report on the project. Approximately 10 commenters indicated a preference for one or more of the alternatives.

#### Results of Scoping

The significant topics that were identified included impacts to:

1. The Very Large Array (VLA) operated by the National Radio Astronomy Observatory, from electromagnetic radiation at frequencies within the operating bands of the VLA;
2. The Visual Resource Management (VRM) Class II area in the Plains of San Agustin and other areas of high visual sensitivity and scenic quality;
3. Wilderness Study Areas (WSAs) and existing wildernesses that could be affected;

- 4. Timber and woodlands from surface disturbing activities;
  - 5. Soils and vegetation from surface disturbing activities and threatened or endangered plant species that occur along the routes;
  - 6. Livestock grazing and livestock operation;
  - 7. Wildlife and wildlife habitat, including threatened, endangered, or sensitive species;
  - 8. Cultural resources from construction and increased visitation via any new roads;
  - 9. Land use from separate rights-of-ways;
  - 10. Health and welfare of human beings, if the transmission line passed over or near domestic households or communities;
  - 11. Forest management, such as potential limitations on the use of prescribed fire as a management tool and potential for increased wildfire hazards; and
  - 12. Local economy, employment, and tax base.
- The following scoping topics of lesser importance were briefly assessed in the MFPA/EIS:
- 1. Air quality;
  - 2. Paleontology;
  - 3. Dispersed recreation opportunities and developed recreation sites; and
  - 4. Existing transportation systems.

The following issues and concerns were identified but were not addressed in the MFPA/EIS because they are not within the scope or jurisdiction of BLM:

- 1. Compensation to private landowners for rights-of-way or access across private land;
- 2. Compensation for damages to private land or improvements;
- 3. Condemnation, fair compensation, and fair market value of private property;
- 4. Right-of-way widths across private property; and
- 5. Areas to be served or not served by an electric company.

#### **CRITERIA**

The following criteria were used to establish standards, rules, and measures in preparing the MFPA/EIS. The criteria helped set the scope of inventory and data collection, identified the range of reasonable alternatives, and guided the extent to which the issues would be analyzed.

- 1. Selection of a route that would not interfere with the frequencies within the operating bands of the Very Large Array;

2. Selection of a route that would maintain the landscape character, scenic areas, and views;
3. Selection of a route that would not cross any wilderness study areas or impair wilderness values;
4. Selection of a route that would avoid or lessen impacts on threatened, endangered, or sensitive plant species;
5. Selection of a route that would lessen disruptions of grazing and livestock operations;
6. Selection of a route that would avoid or lessen impacts on threatened or endangered wildlife species habitat, crucial wildlife habitat, and important seasonal habitat. (The applicant should use existing roads and revegetate disturbed areas, where possible, or close new roads);
7. Selection of a route that would protect or avoid significant cultural sites;
8. Designation of a right-of-way corridor across public land in order to lessen adverse environmental impacts and the proliferation of separate rights-of-way;
9. Selection of a route that would lessen impacts related to forest management, including effects on timber harvest and wildfire hazards; and
10. Consideration of economic and employment impacts to the region associated with project construction and long-term fiscal impacts on affected counties.

#### **DRAFT MFPA/EIS CONSULTATION AND COORDINATION**

While preparing the draft MFPA/EIS for the El Paso Electric 345 kV, Springerville to Deming, Transmission Line Project, the BLM consulted with many federal, state, and local agencies; elected representatives; environmental and citizens groups; industry; and individuals. Many of these participated during the scoping. The following agencies, groups, and individuals received a copy of the draft MFPA/EIS for review. Those identified with an asterisk (\*) provided written or oral comments.

#### **Federal Government Agencies**

Advisory Council on Historic Preservation\*

Department of Agriculture

Forest Service

Soil Conservation Service\*

Department of Energy

Department of the Interior

Fish and Wildlife Service\*

National Park Service\*

Environmental Protection Agency\*

Federal Highway Administration

#### **New Mexico State Government Agencies**

State Clearinghouse

Department of Agriculture\*

Department of Finance and Administration

Department of Game and Fish

Department of Natural Resources\*

Historic Preservation Bureau, State Historic Preservation Officer\*

Public Service Commission  
State Highway Department  
State Parks and Recreation  
State Land Office

#### Local Government Agencies

Apache County Commission  
Catron County Commission\*  
Luna County Commission  
Sierra County Commission  
Socorro County Commission  
City of Truth or Consequences

Mayor, City of Deming  
Mayor, City of Springerville  
Mayor, Town of Socorro  
Mayor, Village of Magdalena  
Mayor, Village of Reserve

#### Environmental Groups

New Mexico Heritage Program  
Historic Preservation Bureau

#### New Mexico State Senators and Representatives

Representatives: Alamagordo,  
Silver City, Socorro  
Senators: Deming, Grants,  
Silver City, Socorro

#### Industries and Individuals

(Detailed list available upon request from Jack D. Edwards, Division of EIS Services, Denver, Colorado.)

#### PUBLIC REVIEW/THE DRAFT MFPA/EIS

The draft MFPA/EIS (INT DEIS 84/59) was filed with the Environmental Protection Agency on January 30, 1985 and announced in the Federal Register on February 7, 1985 (Vol. 50, No. 26, page 5318). In addition, media releases were sent to radio stations and newspapers in the area to be affected by the Proposed Action or alternatives. The releases announced the

availability of the draft MFPA/EIS, described the Proposed Action, identified key impacts, and requested public comment on the adequacy and accuracy of the MFPA/EIS.

About 550 copies of the draft MFPA/EIS were distributed to various individuals, organizations, and government agencies. Copies of the final MFPA/EIS may be obtained from:

Bureau of Land Management  
Las Cruces District Office  
P.O. Box 1420  
Las Cruces, New Mexico 88001

#### COMMENTS AND RESPONSES

Public hearings were held in Deming, New Mexico on April 2, 1985 and in Reserve, New Mexico on April 3, 1985. About 16 people attended the Deming hearing, with 5 people presenting testimony.

Approximately 20 people attended the Reserve hearing, with 6 people presenting testimony. Public hearing transcripts have not been reprinted; however, copies may be reviewed at the BLM Las Cruces District Office.

BLM received 27 letters on the draft MFPA/EIS during the 90-day public review period. All letters were assigned a reference number and reviewed.

Substantive comments (those that presented new data or issues, suggested changes, sources, or methodologies) from the public hearings and the comment letters were identified and responded to. All letters (except attachments) have been reprinted. Those with substantive comments appear in the first part of this section; those that present opinions and recommendations appear in the second part.

Table 10 lists the reference numbers and identifies the commenters. All required changes have been addressed in this final MFPA/EIS. The responses that immediately follow each letter are

identified by the reference numbers that appear on the comment letter. The responses either indicate a change was made or explain why a change to the draft MFPA/EIS was not appropriate.

TABLE 10  
PUBLIC HEARING AND COMMENT LETTER REFERENCE NUMBERS

Reference	Source	Location
<u>Public Hearing:</u>		
D1*	Richard Krol	Deming, NM
D2*	Joe Bill Nunn	Deming, NM
D3	Alan Beck	Deming, NM
D4	Jay Cox	Deming, NM
D5	Bucky McCauley	Deming, NM
R1	Lowell Summer	Reserve, NM
R2	Leonard L. Lett	Reserve, NM
R3	Tapley Kent	Reserve, NM
R4	Arthur L. Tackman	Reserve, NM
R5	Randy Greenwood	Reserve, NM
R6	Lamar Mahler	Reserve, NM
<u>Comment Letter:</u>		
1	U.S. Department of Housing and Urban Development	Fort Worth, TX
2	Lowell and Marietta M. Sumner	Glenwood, NM
3	Advisory Council on Historic Preservation	Golden, CO
4*	U.S. Fish and Wildlife Service Ecological Services	Albuquerque, NM
5	U.S. Department of Commerce National Oceanic and Atmospheric Administration	Washington, D.C.
6	Allan Beck	Deming, NM
7	R.J. Franzory	Deming, NM
8*	U.S. Department of Interior Geological Survey	Reston, VA
9	New Mexico Department of Agriculture	Las Cruces, NM

TABLE 10 (concluded)

Reference	Source	Location
10	U.S. Environmental Protection Agency	Dallas, TX
11	Leonard L. Lett	Glenwood, NM
12*	Thomas Merlan	Santa Fe, NM
13	U.S. Department of Agriculture Soil Conservation Service	Albuquerque, NM
14*	National Radio Astronomy Observatory	Socorro, NM
15	U.S. Department of Interior Bureau of Reclamation Southwest Region	Amarillo, TX
16	Ben H. Thompson	Glenwood, NM
17*	U.S. Department of Interior Bureau of Mines Intermountain Field Operations Center	Denver, CO
18	Department of the Army Corps of Engineers Albuquerque District	Albuquerque, NM
19	Phelps Dodge	Tyrone, NM
20*	State of New Mexico Natural Resources Department	Santa Fe, NM
21	Tucson Electric Power Company	Tucson, AZ
22*	Thomas W. Merlan	Santa Fe, NM
23	Leidrue Hyatt	Deming, NM
24*	El Paso Electric Company	El Paso, TX
25	Catron County Commission	Reserve, NM
26*	State of New Mexico Office of Cultural Affairs Historic Preservation Division	Santa Fe, NM
27	U.S. Department of the Interior National Park Service Southwest Region	Santa Fe, NM

\*Indicates letters containing substantive comments.

Public Hearing Comments--Deming, New Mexico--April 2, 1985

Speaker: Richard Krol, private rancher.

Comment: "There are a lot of promises in this book, guidelines, revegetation, reconstruction after a dam is torn up, control erosion. My question is: What if El Paso Electric does not do any of these things? What if they don't revegetate it? What if they don't control erosion? What if they are--or their contractors leave gates open like they did in the past so cattles were let on the highway? What is our course? What guarantee does the private landowner have that El Paso Electric will follow these..."

Response: Easement negotiations between landowners and the applicant should include discussions concerning the questions outlined in the comment. Easement contracts also can specify the type of reclamation, inspection, and monitoring procedures required of El Paso Electric Company (El Paso) by individual landowners. Inspection, monitoring, and certification of successful revegetation and erosion control are the responsibility of the landowner on private lands. If the easement contract was not fully honored then legal recourse may become necessary. BLM has no jurisdiction over private lands.

Speaker: Joe Bill Nunn, private rancher.

Comment: "There is certainly more than 2 miles of visual impact along New Mexico Highway 26 between Deming and Nutt and Highway 27 between Nutt and Lake Valley than is reported in the impact statement. No consideration is given for the visual impact in the Winston-Dusty area where the line parallels New Mexico 52 and eventually Highway 60, certainly one of the most scenic areas covered in any of the alternatives."

Response: Of the 27 miles of proposed transmission line between Deming and Nutt, only about 2 miles would cross lands classified as VRM Class II areas. The transmission line along these 2 miles would not meet the standards of VRM Class II and, therefore, would cause a significant impact to the visual resource. The remaining 25 miles of transmission line would cross VRM Class III areas, where the standard could be met.

In response to your concern that no consideration was given to impacts in the Winston-Dusty area and near New Mexico Highway 52, Table 2-2 indicates 17 miles of significant visual resource impacts between MP 82 and MP 112.5. The modified Proposed Action would lessen the impacts to 6.5 miles as viewed from New Mexico Highway 52, with no impacts occurring to the communities of Winston and Dusty.

Visual resource impacts as viewed from U.S. Highway 60 were judged to be insignificant because of the sensitive alignment designed for the area where the project would parallel or cross the highway. The impacts would be acceptable for the VRM Class II and IV areas where the project would be located.

Comment: "I notice there were some differences that I had found in the impact statement. I noticed in the impact statement it mentioned one of these routes--only four headquarters would be passed over and I can count more than that from Deming to Nutt."

Response: The map and data provided by Mr. Nunn was reviewed. The updated Geological Survey topographic maps, scale 1:24,000, used in the analysis were reexamined for possible ranch headquarters and watering facilities. The numbers presented in the draft MFPA/EIS are correct for those facilities occurring within the 0- to 250-foot and 500- to 1,000-foot distances. Some of the facilities indicated by Mr. Nunn are located beyond these distances; therefore, no changes were made to the draft MFPA/EIS.



# **Comment Letters Requiring Responses**



UNITED STATES  
DEPARTMENT OF THE INTERIOR  
FISH AND WILDLIFE SERVICE

Field Supervisor  
Ecological Services, USFWS  
Post Office Box 4487  
Albuquerque, New Mexico 87196

February 20, 1985

Memorandum

To: Mr. Jack Edwards, Project Leader, Bureau of Land Management,  
Division of EIS Services, Denver, Colorado

From: Field Supervisor, FWS, Ecological Services, Albuquerque,  
New Mexico

Subject: Review of Draft Environmental Impact Statement for El Paso  
Electric Proposed 345 kV, Springerville to Deming, Transmission  
Line Project, Catron to Luna Counties, New Mexico (BLM)  
(EC-85/7)

The U.S. Fish and Wildlife Service has reviewed the subject document and offers the following comments.

We favor a route following Alternative B from Deming for 30 miles and then switching to your Proposed Action route. We feel that this would result in less impact to important fish and wildlife habitat resources than any of the other proposed alternatives. We object most strongly to Alternative C, because it would impact a greater diversity of sensitive wildlife habitats and because the more severe slopes encountered along this route would create a greater erosion potential of disturbed areas.

The document should stipulate the following, regardless of the route chosen:

4.1

- destruction to mule deer winter range and to other important wildlife habitats will be minimized;
- critical wildlife habitat to which disturbance is unavoidable will be fully reclaimed or compensated;
- at specific sites where adverse project impacts to wildlife resources are expected, appropriate coordination will be conducted with the New Mexico Department of Game and Fish and the U.S. Fish and Wildlife Service to identify mitigation or compensation needs.

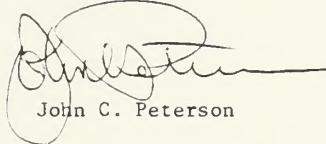
## Comment Letter 4 (Continued)

2

### Specific comments:

- 4.2 | Page 124, Soils and Vegetation. This section should include the stipulation that any new roads constructed for the project be closed to public access, and those not needed for project maintenance be reseeded.
- 4.3 | Page 124, Soils and Vegetation, C-(1). As discussed in the body of your document, riparian and pseudoriparian vegetation communities provide important wildlife habitat. Therefore, the U.S. Fish and Wildlife Service and the New Mexico Department of Game and Fish should be consulted regarding implementation of selective clearing of vegetation or selection of alternate routes.
- 4.4 | Page 124, Soils and Vegetation, d. The last sentence should read, "... reseeding attempts will be made until permanent ground cover is established."
- 4.5 | Page 125, Wildlife. Company conformance with requirements contained in Suggested Practices for Raptor Protection on Power Lines regarding phase spacing, etc. to prevent electrocutions will conserve wildlife resources. In addition, this section should stipulate that raptor surveys be performed and any construction activities within one mile of active nests be timed so as to avoid nesting season, i.e., construction activities in such areas should only take place between July 1 and January 31.

Thank you for this opportunity to provide inputs.



John C. Peterson

cc:

Director, New Mexico Department of Game and Fish, Santa Fe, New Mexico  
District Manager, Bureau of Land Management, Socorro, New Mexico  
Director, FWS/EC, Washington, D.C.  
Regional Director, FWS, Habitat Resources, Albuquerque, New Mexico



#### **Responses to Comment Letter 4**

- 4.1 No mule deer winter range or other important wildlife habitats would be destroyed. No significant impacts to habitat would occur from the Proposed Action or any alternative (page 8 of the draft MFPA/EIS). Reclamation of all disturbance on federal land is required (page 126 and subsequent pages of the draft MFPA/EIS). No adverse project impacts to wildlife resources are expected for any of the possible routes (page 8 of the draft MFPA/EIS); therefore, no changes were deemed necessary.
- 4.2 This requirement was identified in the draft MFPA/EIS (Appendix 2, page 128, item 9). El Paso is required to follow this measure on all public lands.
- 4.3 This suggested change has been made. Please see Section 3 for change to page 124 of the draft MFPA/EIS.
- 4.4 This suggested change has been made. Please see Section 3 for change to page 124 of the draft MFPA/EIS.
- 4.5 This suggested change has been made. Please see Section 3 for change to page 125 of the draft MFPA/EIS.



**United States Department of the Interior**

GEOLOGICAL SURVEY  
RESTON, VA. 22092

In Reply Refer To:  
WGS-Mail Stop 423

APR 2 1987

**Memorandum**

To: Project Leader, Bureau of Land Management,  
Division of EIS Services, Denver, Colorado

From: Assistant Director for Engineering Geology

Subject: Review of draft environmental statement for El Paso Electric  
345 kV, Springerville to Deming transmission line

We have reviewed the draft statement as requested in the cover letter of January from the State Director, Bureau of Land Management.

- 8.1** The statement should address the potential for delayed, long-term secondary effects that might result from increased use of ground water to supply increased irrigation, industrial growth, or residential development encouraged by the improved availability of electric power.

James F. Devine

## **Response to Comment Letter 8**

- 8.1 The Proposed Action would provide El Paso the capability to obtain lower cost power, more transfer capability, and a more reliable transmission system. These factors could encourage increased use of ground water to supply increased irrigation, industrial growth, or residential development. However, potential growth in these sectors would be influenced more by physical limitations (falling ground water tables) and institutional constraints. The most likely scenario would call for lower electrical power costs to offset increased pumping costs from falling ground water tables, in order to maintain current levels of use. While this pattern and location of development could change, depending on the physical and legal availability of ground water, long-term secondary effects of ground water use is speculative and beyond the scope of the MFPA/EIS. Therefore, no changes were deemed necessary.

## Comment Letter 12

1677 Cerro Gordo Road  
Santa Fe, New Mexico

Jack D. Edwards  
Bureau of Land Management  
Division of EIS Services  
555 Zeng Street, First Floor East  
Denver, Colorado 80226

Dear Mr. Edwards:

This is to state that I have read the draft EIS titled El Paso Electric 345 KV, Springerville to Deming, Transmission Line Project (January 1985).

I am opposed to the proposed action and alternatives because, as noted in the draft EIS, that action and alternatives (p. 38; pp. 63-64; pp. 75-76; p. 89) "would not meet the standards of the VRM class for the areas where the project would be located." I am specifically opposed to Alternatives A and B, which would have a severe, non-reversible effect on my lands in Catron County due to the degradation of their scenic value.

12.1 I would like to point out that the draft incorrectly states that "no federally listed or proposed threatened or endangered plant or animal species are known to occur along any of the proposed routes" (p. 1; p. 33). Alternatives A and B cross peregrine falcon nesting and breeding areas. The West Socorro Range Land Management Program (May 1982; p. D-5) identifies the peregrine falcon as rare and endangered.

I am opposed to the proposed action and alternatives in view of their adverse visual effects on various Wilderness Study Areas, and specifically the Horse Mountain WSA.

12.2 The draft states that "there are no known inconsistencies or conflicts between the proposed project and officially approved and adopted resource-related policies and programs of BLM" (p. 16). This statement is contradicted by statements referenced above regarding VRM and wilderness standards.

12.3 The draft appears to state (p. 28) that TEPC transmission lines through the existing Forest Service Corridor are not fully obligated. I object to the proposed action and alternatives on the grounds that existing lines are not fully obligated, and that consequently the need for new lines has not been adequately or conclusively demonstrated. The draft also states (p. 28) that the Greenlee to Deming Alternative, involving use of an existing corridor, has been eliminated after preliminary evaluation. I

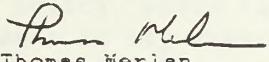
**Comment Letter 12 (Continued)**

12.3 | object to the proposed action and alternatives on the grounds  
con't | that the elimination of this alternative is not adequately or  
conclusively explained.

12.4 | In my opinion, use of existing corridors is the preferable and  
logical means of limiting environmental effects. Failure to  
explain the alternatives in adequate detail is in violation of  
NEPA (P.L. 91-190, 83 STAT 853) Section 102(C)(iii) and (D) and  
40 CFR Part 1502.14(a), (b) and (c), in that the mention of  
alternatives not chosen fails to explain why they were  
eliminated.

Thank you for your attention to this matter.

Sincerely,

  
Thomas Merian



## **Responses to Comment Letter 12**

- 12.1** According to the Fish and Wildlife Service (letter in Appendix 3 of the draft MFPA/EIS), no federally listed threatened or endangered species are found along any of the proposed routes.
- 12.2** No contradictions are presented. The VRM program objectives include a mandate to "minimize the adverse visual impacts of BLM land-use management practices on the visual resource while maintaining the effectiveness of the land-use practices" (BLM Manual 8400.02). In this case, the proposed project would be an accepted use of public lands and the stated visual resource impacts would be minimized to the extent possible to protect the visual quality of the project area.

As stated in the Wilderness section, no significant, direct impacts to the wilderness resource are anticipated as a result of the proposed project crossing the boundary of any wilderness unit, since no crossings are planned. Some dust or noise during construction, although short-term in nature, may be perceived from within the WSA. After the project is built, it may be seen from the WSA depending on the perspective of the viewer. These types of impacts are not restricted by BLM policy, since the approval of a project cannot be denied solely because it may create outside sights that may affect a user within a WSA. It is also not BLM's policy to create protective buffer zones around wilderness areas or potential wilderness areas.

- 12.3** The existing Forest Service corridor is fully obligated and contains two transmission lines that serve the present and future needs of TEPC's service area. The existing corridor crossing the San Francisco Wilderness could not be widened, thus preventing the Greenlee to Deming Alternative from being considered.
- 12.4** The existing Forest Service corridor is fully obligated. Alternative C is considered a new corridor and was analyzed in the draft MFPA/EIS.

## Comment Letter 14



### NATIONAL RADIO ASTRONOMY OBSERVATORY

POST OFFICE BOX O SOCORRO, NEW MEXICO 87801-0387  
TELEPHONE 505 772-4011 TWX 910 988-1710

April 11, 1985

Jack Edwards, Project Leader  
Bureau of Land Management  
Division of EIS Services  
555 Zang Street, First Floor East  
Denver, Colorado 80228

Dear Mr. Edwards:

We have examined the Draft Environmental Impact Statement for the El Paso Electric 345 KV, Springerville to Deming, Transmission Line Project. Of particular interest were the potential impacts of the Proposed Action and alternatives upon the present and future operations of the Very Large Array (VLA) on the Plains of San Agustin and upon the Very Long Baseline Array (VLBA). We agree with your assessments of the potential impacts on these two radio telescopes. Neither the Proposed Action nor any of the alternatives would effect the current operation of the VLA. However, the Proposed Action would preclude the extension of the southwest arm of the VLA whereas the three alternatives considered, including the preferred San Agustin Alternative, would not. None of the plans considered would affect the VLBA.

The proposed extension of the southwest arm would consist of installing low frequency antennas at isolated, fixed locations along the southwest line. The antennas would be less obtrusive than existing VLA antennas and could be painted to match the surroundings. There would be no railway track and the antennas would be about 1 mile apart so their impact on the Plains of San Agustin would be much less than the current VLA. We strongly recommend against precluding this future improvement of the VLA by selecting the Proposed Action, when other suitable paths for the transmission line are available. The VLA is one of the most sophisticated and expensive basic research facilities owned by the U. S. Federal Government, and its remote location was specifically chosen to minimize the potential impact of man-made radio interference. To preclude possible future development opportunities for such an important facility would be a mistake.

We have several corrections and additions to suggest:

1. On p. 18 under Special Management Areas, change to:

14.1

Other areas of concern are two facilities of the National Radio Astronomy Observatory, which is operated by Associated Universities, Inc. under contract with the National Science Foundation: the Very Large Array (VLA) and Very Long Baseline Array (VLBA). The VLA is a

## **Comment Letter 14 (Continued)**

Jack Edwards

2

11 April 1985

- 14.1** | \$78 million array of 27 antennas that is the world's most powerful  
con't | radio telescope. The Proposed Action would pass 8 miles...
- 14.2** | 2. On p. 18, change "the sun, near stars, our galaxy" to "the sun,  
nearby stars, our galaxy."
- 14.3** | 3. On p. 19, change "The VLA operates...able to operate at 75 MHz" to  
| "The VLA operates at frequencies of 1.5, 4.9, 14.9, and 22 gigahertz  
(GHz), and equipment for operation at 75 and 327 megahertz (MHz) and  
8.4 GHz is now being installed."
- 14.4** | 4. On p. 19, also under Special Management Areas, add a paragraph:  
  
The VLBA will be a \$60 million array of 10 antennas located around the  
United States, including sites in Hawaii, New England, Puerto Rico,  
and New Mexico. One of the New Mexico sites is near Pie Town and  
possible future sites are near Dusty and Bernardo. Construction will  
begin on 15 May 1985, and when completed in 1992, the VLBA will be the  
world's largest radio telescope. Each VLBA antenna will be 82 feet in  
diameter and will operate at 327 and 610 MHz, and at 1.5, 2.3, 4.9,  
6.1, 8.4, 10.7, 14.9, 22, 43, and 86 GHz. The sites in New Mexico  
will also be equipped at 75 MHz. The VLBA will give the same results  
as if a single radio telescope, 5000 miles in diameter, were used.  
The VLBA will be used by astronomers from throughout the world to  
study the planets, the sun, nearby stars, our galaxy, distant  
galaxies, and the most distant quasars.
- 14.5** | 5. On p. 34 under Electromagnetic Interference change "The VLA  
presently... at 75 MHz" to "The VLA presently operates at frequencies  
of 1.5, 4.9, 14.9, and 22 gigahertz. Equipment for operation at 75  
and 327 MHz and 8.4 GHz is being installed."
- 14.6** | 6. On p. 34 under Electromagnetic Interference change "The primary  
source... the EMI can be detected" to "The primary local source of EMI  
at 75 MHz to the present VLA operation is vehicular traffic on nearby  
U. S. Highway 60 and the access roads to the VLA. The interference  
generated by vehicular electrical systems is rejected by the VLA  
because it is intermittent as a vehicle passes the installation."
- 14.7** | 7. On p. 34 under Electromagnetic Interference, Very Large Array, add  
a paragraph:  
  
Communication and control, during and after the construction phase of  
the project, will be provided through a microwave radio system. This  
system should be designed to reduce the potential for interference to  
the VLA and VLBA.

## Comment Letter 14 (Continued)

Jack Edwards

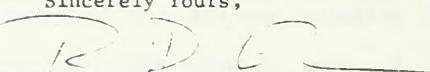
3

11 April 1985

- 14.8    8. On p. 63, under Impacts, "The calculated EMI at the VLA southwest antenna would be -75 dBW/m<sup>2</sup> Hz..." is incorrect. The calculated EMI should be -275 dBW/m<sup>2</sup>/Hz.
- 14.9    9. On p. 119 under Results of Scoping, change "1. The Very Large Array... bands of the VLA" to "1. The Very Large Array (VLA) and the Very Long Baseline Array (VLBA) operated by the National Radio Astronomy Observatory, from electromagnetic radiation at frequencies within the operating bands of the VLA and VLBA."
- 14.10    10. On p. 120 under Criteria, change "1. Selection of a route... Very Large Array" to "1. Selection of a route that would not interfere with the frequencies within the operating bands of the Very Large Array and the Very Long Baseline Array."

Once the Project starts, we will have two concerns: Coordination with El Paso Electric in the design of the microwave radio system for communication and control, to minimize the potential for interference to the VLA and VLBA; and determination of the level of traffic during the construction phase, and the associated impact, on the transportation network between Socorro, the VLA, and the VLBA site near Pie Town.

Sincerely Yours,

  
R. D. Ekers

Site Director

RDE/tm

**Responses to Comment Letter 14**

- 14.1 The section on Special Management areas describes existing special areas. Since the Very Large Baseline Array (VLBA) is not an existing facility, it is not described in this section. The VLBA proposed for Pie Town is described on page 34 of the draft MFPA/EIS.
- 14.2 This suggested change has been made. Please see Section 3 for change to page 18 of the draft MFPA/EIS.
- 14.3 This suggested change has been made. Please see Section 3 for change to page 19 of the draft MFPA/EIS.
- 14.4 See response to comment 14.1. The information that you provided about the VLBA, which has a bearing on the impact analysis, was added. Please see Section 3 for change to page 34 of the draft MFPA/EIS.
- 14.5 This suggested change has been made. Please see Section 3 for change to page 34 of the draft MFPA/EIS.
- 14.6 Your suggested change to the material on page 34 of the draft MFPA/EIS appears to have the same meaning as currently stated. Therefore, no change was deemed necessary.
- 14.7 The meaning of this comment is unclear. This section (page 34 of the draft MFPA/EIS) describes the existing environment. We are unaware of any microwave facilities in the area. Since the Proposed Action would not contain any microwave facilities, no changes were deemed necessary.
- 14.8 This change has been made. Please see Section 3 for change to page 63 of the draft MFPA/EIS.
- 14.9 The term "VLA" was used to encompass all the existing and proposed and facilities of the Very Large Array. Therefore, no change was made.
- 14.10



**United States Department of the Interior  
BUREAU OF MINES**

P. O. BOX 25086  
BUILDING 20, DENVER FEDERAL CENTER  
DENVER, COLORADO 80225

Intermountain Field Operations Center

April 19, 1985

**Memorandum**

To: Jack Edwards, Project Leader, Bureau of Land Management, Division of EIS Services, 555 Zang Street, First Floor East, Denver, CO 80228

From: Chief, Intermountain Field Operations Center

Subject: Review of draft environmental impact statement on the El Paso Electric 345-kV Springerville To Deming Transmission Line - New Mexico

Personnel of the Bureau of Mines have reviewed the subject document to determine whether mineral resources are adequately considered.

The draft environmental impact statement (DEIS) describes and compares a proposed corridor and three alternate routes for an electric transmission line between the El Paso Electric Company Luna substation, 1.5 miles north of Deming, New Mexico, and a point on the existing Tucson Electric Power Company transmission line near Red Hill, New Mexico. The proposed action (PA), alternate route A, and alternate route B would follow the same corridor for many miles; however, alternate route C would follow a completely independent corridor. The proposed transmission corridor would be 100 feet wide and the towers would be about 800 feet apart.

Proposed transmission line corridors would traverse several mining districts. The proposed action route passes through or near five mining districts: (1) Chloride (gold, silver, copper); (2) Hermosa (silver, lead, copper, zinc); (3) Hillsboro (gold, silver, copper, lead, vanadium, iron, manganese, molybdenum); (4) Lake Valley (silver, manganese, lead, perlite); and (5) Las Animas Placer (gold). Alternate route A passes near the Fluorite Ridge district (fluorspar) in addition to the districts listed for route PA. Alternate route B crosses two districts in addition to those listed under route PA: (1) Taylor Creek (tin) and (2) Acme Clay (clay). Alternate route C passes through or near five mining districts: (1) Burro Mountains (copper, turquoise, fluorspar, gold, bismuth, molybdenum, manganese); (2) Duck Creek

**Comment Letter 17 (Continued)**

Valley (pumicite, diatomite); (3) Fleming (silver, fluorspar, manganese); (4) Santa Rita (copper, molybdenum, gold, silver, antimony, rhenium); and (5) Silver City (iron, manganese, clay).

17.1

Because of the configuration of the proposed transmission line, we believe that impacts on mineral resources would be minimal. The DEIS, however, gives no indication whether potential impacts to mineral resources were considered and is inadequate in this regard. Although mining (p. 41) and the copper industry (p. 53) are mentioned briefly in the DEIS, and under the no-action alternative (p. 103), power generation using coal or oil and gas is discussed, there is no discussion of mineral resources in the immediate area of the proposed transmission line. Mineral resources and potential impacts on minerals should be addressed in subsequent versions of the document. If no significant impacts are anticipated, a statement to that effect should be included.

  
William Cochran



Response to Comment Letter 17

17.1 Mineral resources are addressed under the general statement of no significant impact on page 33 of the draft MFPA/EIS. The term "geological resources" has been changed to mineral resources. See Section 3 for change to page 33 of the draft MFPA/EIS.



TONEY ANAYA  
GOVERNOR

STATE OF NEW MEXICO  
NATURAL RESOURCES DEPARTMENT

Santa Fe 87503  
(505) 827-7835

LEO GRIEGO  
SECRETARY

April 26, 1985

Mr. Jack Edwards, Project Leader  
Bureau of Land Management  
Division of EIS Services  
555 Zang Street, First Floor East  
Denver, Colorado 80228

Dear Mr. Edwards;

Thank you for the opportunity to review and comment on the El Paso Electric 345 KV, Springerville to Deming, Transmission Line Project Draft Environmental Impact Statement (DEIS). After reviewing the DEIS the Natural Resources Department staff have the following concerns.

20.1 The need for additional power is not adequately addressed in the document. Based on the DEIS it is difficult to ascertain the real need for the project. Statements such as "help meet El Paso's forecasted need for power" do not necessarily support the real need for additional power.

20.2 The DEIS is in error on page 5 when discussing the threatened and endangered plant species and candidates. The DEIS mentions six taxa of concern identified by the State of New Mexico. Dr. Deardorff's letter from the Natural Resources Department dated November 21, 1984 in Appendix 3 identifies 11 state listed taxa of concern and seven federal candidates. In addition to the species identified by Dr. Deardorff the following candidates for federal and state listing; Silene wrightii, Erigeron scopulinus, and Pteryxia davidsonii, have been identified by Paul Knight of our Resource Management and Development Division as occurring along some or all of the proposed routes. We strongly recommend that the Natural Resources Department, Resource Management and Development Division be contacted for information on sensitive plants prior to work on the proposed powerline.

All the proposed routes have some impact on cultural resources which include both archaeological and historic sites. If you have not already done so, we recommend that you consult with the State Historic Preservation Office to ensure legal compliance with the National Historic Preservation Act and implementing of regulation 36 CFR 300.

"The Natural Resources Department is An Equal Opportunity Employer"

**Comment Letter 20 (Continued)**

Powerline Comments  
April 26, 1985  
Page Two

We can not support a route which would go through the Very Large Array as the company preferred to do. It is important to keep that area as it is now for the scientific work that is being conducted. Alternative C would conflict with both sensitive plant and rapture habitats. If the need for additional power is determined to be real, Alternative B might be the best route for the powerline.

Sincerely, .

*Leo Griege*

LEO GRIEGO  
Secretary

LG:JB:mc



**Responses to Comment Letter 20**

- 20.1 It is felt that El Paso's need for power is described adequately for the purpose of BLM's deciding whether to grant a right-of-way. El Paso has a contract to take delivery of the power at Springerville. El Paso will need a certificate of convenience from the New Mexico Public Utility Commission; the commission will decide if it can support this need.
- 20.2 Thank you for the new data. Please see Section 3 for changes to Appendix 3 of the draft MFPA/EIS. Also, please see the revised Summary in this MFPA/EIS.

## Comment Letter 22

1677 Cerro Gordo Road  
Santa Fe, New Mexico  
April 25, 1985

Jack D. Edwards  
Bureau of Land Management  
Division of EIS Services  
555 Zang Street, First Floor East  
Denver, Colorado

RE: Additional Comments on Draft EIS: El Paso Electric 345 KV,  
Springerville to Deming, Transmission Line Project

Dear Mr. Edwards:

This is to note that I met with New Mexico State Director Charles W. Luscher on April 24, 1985 to acquaint him with my objections to the proposed El Paso Electric 345 KV line from Springerville to Deming as described in the draft environmental statement of January, 1985.

Mr. Jaime Provencio noted during that meeting that Mr. Ron Henderson, at a public meeting in Reserve, New Mexico in April, 1985, had stated that the U.S. Forest Service objected to running the line across the Gallo Mountain area of the Apache National Forest both because this is a prime woodcutting area and due to its archaeological sensitivity. The line, however, will not diminish fuelwood availability, while archaeological sites can be avoided if they are adequately identified in advance.

Mr. Luscher noted that no funds are available for the construction of the Very Large Array extension. If this is the case, the VLA should not stand as an objection to the Preferred Alternative.

Placing the line on the edge of or within the foothills of the Mangas Mountain area or adjacent to Horse Mountain, on the boundary of the WSA, would diminish its visibility both from the Plains of San Augustin and from the Horse Mountain WSA, and is preferable to placing it in the open area north of Horse Springs, where it will have a severe and irreversible adverse effect on visual resources which contribute substantially to the value of my land.

I object to Alternatives A and B as stated in my previous letter (which was received by your office on April 11, 1985) on the grounds that mitigation of adverse visual effect has not been adequately considered. I request that the Bureau design the project so as to meet the standards of VRM classes for the areas in which the project will be located.

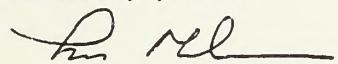
22.1

**Comment Letter 22 (Continued)**

Page 2 Additional Comments on Draft EIS: El Paso Electric 345 KV,  
Springerville to Deming, Transmission Line Project

Please consider the above comments in your response to my  
original review of the draft EIS.

Sincerely yours,



THOMAS W. MERLAN  
HORSE SPRINGS RANCH

cc. Charles W. Luscher, State Director



**Response to Comment Letter 22**

- 22.1 The Proposed Action and the Very Large Array Alternative (A) alignments have been changed in both of these areas. See Section 2 of this MFPA/EIS for changes. The alignments were changed primarily to be more compatible with the landscape, thus lessening visual resource impacts.

**Comment Letter 24**



El Paso Electric Company  
P.O. Box 982  
El Paso, Texas 79960  
(915) 543-5711

May 16, 1985

RECEIVED  
MAY 2 1985  
EIS OFFICE

Mr. Jack Edwards  
U.S. Dept. of the Interior  
Bureau of Land Management  
555 Zang Street, 1st Floor East  
1st Floor East  
Denver, Colorado 80228

Dear Jack:

El Paso Electric Company is formally requesting a change in the routing of "Proposed Action" published in the DEIS. The changes requested are:

- 24.1
1. Eliminate existing Proposed Action between mile post 30 just north of Nutt and mile post 113 north of Dusty. Replace the above described eliminated portion with the route drawn on the USGS maps given to you at our meeting in Las Cruces on the 10th of April, 1985.
  2. Eliminate the existing Proposed Action between mile post 125 and 157. Replace this eliminated portion with the route drawn on the USGS maps given to Marvin James in Las Cruces on 15th of April, 1985.

Because of our contacts with the public, we feel that these changes will reduce the impact of the Proposed Action on private land owners and on the environment. If you have any queestions, please contact us.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Whitsacre".

J. Whitsacre  
Systems Engineering Supervisor

**Response to Comment Letter 24**

- 24.1 Thank you for the suggested changes to the Proposed Action and the Very Large Array Alternative (A). These changes would reduce impacts to the environment and, therefore, have been analyzed in this final MFPA/EIS (Section 2).

## Comment Letter 26



TONEY ANAYA  
GOVERNOR

STATE OF NEW MEXICO  
OFFICE OF CULTURAL AFFAIRS  
HISTORIC PRESERVATION DIVISION

VILLA RIVERA ROOM 101  
228 EAST PALACE AVENUE  
SANTA FE, NEW MEXICO 87503  
(505) 827-8320

JILL Z. COOPER  
CULTURAL AFFAIRS OFFICER

THOMAS W. MERLAN  
DIRECTOR

April 29, 1985

Mr. Jack Edwards  
Project Leader  
Division of EIS Services  
Bureau of Land Management  
555 Zang Street, First Floor East  
Denver, Colorado 80228

Re: El Paso Electric 345kV Transmission Line

Dear Mr. Edwards:

At the request of Mr. Charles W. Luscher, New Mexico State Director, I have reviewed the Bureau of Land Management "Draft Environmental Impact Statement on the El Paso Electric 345kV Springerville to Deming Transmission Line", and I would like to offer the following comments:

I agree with the determination that the selected alternative for the transmission line should be subjected to a Class III archaeological survey in order to locate all cultural resources which may be eligible for inclusion in the National Register of Historic Places. Existing inventory data for all the alternative routes being considered is inadequate to determine the effects of the proposed undertaking on all significant historic properties which may be affected. The level of survey effort proposed is, in my opinion, justified by this lack of existing inventory data.

Upon completion of the inventory survey, further consultation to evaluate recorded resources, to consider the effects on those resources, and to determine the appropriate treatment for those resources which cannot be avoided can be completed as outlined in Appendix 2 of the DEIS. While I consider these measures to be generally adequate to protect important site values, I would like to suggest that a Memorandum of Agreement be initiated earlier in the consultation process. The MOA which I propose would cover development of a plan for the inventory survey of the selected alternative, establish a framework within which the National Register eligibility of recorded resources can be more reasonably determined, and, as stated in the DEIS, call for the development of a treatment plan for those National Register-eligible properties for which adverse effects cannot be avoided. Development of this more comprehensive MOA at an earlier stage of our consultation could eliminate delays which might

## **Comment Letter 26 (Continued)**

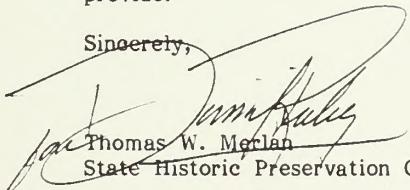
Mr. Jack Edwards  
April 29, 1985  
Page Two

arise if such an agreement is attempted after the survey has been completed and the line is about to be constructed.

**26.1** I am enclosing for your consideration a complete listing of properties entered in the State Register of Cultural Properties for the five counties crossed by the transmission alternatives. Those properties which may be affected by the alternative routes have been checked. The Final EIS should give consideration to the potential effects to these currently registered properties. The inventory survey of the selected alternative should also include consideration of these properties in order that an accurate determination of the actual effects of transmission line construction can be made.

I thank you for the opportunity to comment on the Draft EIS for this undertaking. Please contact this office with any questions you may have regarding my comments, or if there is any additional information which I can provide.

Sincerely,



Thomas W. Merlan  
State Historic Preservation Officer

TWM:DER:bc

Enclosure

cc: Charles W. Luscher  
Daniel C.B. Rathbun  
Robert Fink



**Response to Comment Letter 26**

- 26.1** The State Register of Cultural Properties was reviewed during preparation of the draft MFPA/EIS. All properties occurring within the corridor were counted. The impact described in the draft MFPA/EIS would be the same for any properties that may have been missed. The procedures outlined in Appendix 2, pages 123 and 124 of the draft MFPA/EIS, would assure protection of the sites you indicated. The information you provided will be given to the archaeologist performing the required intensive surveys on the route approved for construction. Therefore, no change in the draft MFPA/EIS was deemed necessary.



# **Comment Letters Requiring No Responses**

## Comment Letter 1



**U.S. Department of Housing and Urban Development**  
Fort Worth Regional Office, Region VI  
221 West Lancaster  
Fort Worth, Texas 76113

FEB 12 1985

Mr. Jack Edwards, Project Leader  
Bureau of Land Management  
Department of the Interior  
555 Zang Street, First Floor East  
Denver, Colorado 80228

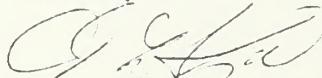
Dear Mr. Edwards:

SUBJECT: Draft Environmental Impact Statement (DEIS)  
El Paso Electric 345 KV, Springerville to Deming Transmission  
Line, January 1985

The Draft Management Framework Plan Amendment/Environmental Impact Statement (MFPA/EIS) on the proposed El Paso Electric 345 KV Springerville to Deming Transmission Line, has been reviewed by the Environmental Office in the Fort Worth Regional Office of the Department of Housing and Urban Development (DHUD).

It has been determined that the DHUD will not have comments on the MFPA/EIS, as the undertaking and its impact do not fall within our particular areas of environmental concerns and/or programs.

Sincerely,

A handwritten signature in black ink, appearing to read "I. L. Sanchez-Davis".

I. L. Sanchez-Davis  
Acting Regional Administrator--  
Regional Housing Commissioner

## Comment Letter 2



Mr. & Mrs. Lowell Sumner  
P.O. Box 278  
Glenwood, NM 88039

February 15, 1985

Dr. Jack Edwards, Project Leader  
Bureau of Land Management  
Division of EIS Services  
555 Zang St., First Floor East  
Denver, CO 80228

Dear Mr. Edwards:

Following a careful examination, here are our comments concerning your Draft Environmental Impact Statement (DEIS) on the El Paso Electric 345 KV Springerville to Deming Transmission Line, dated January 1985.

We concur in the analyses, which we feel do fairly present the pros and cons of each of the four routes under consideration, namely: PA (your preference); Alternate A; Alternate B (your preferred alternate); and Alternate C, which we consider a grave threat to the scenic resources on which our local economy depends.

We will not pass judgement on the relative merits of Routes PA, A and B, which are on the other side of the mountains from Glenwood. But we are keenly aware of the threats presented by Gila Alternative C to the scenic, recreational and property values of the San Francisco River Valley where we live. Your DEIS supports the conviction of San Francisco Valley residents when it describes these threats clearly and states that Alternative C "would irreversably and irretrievably affect cultural resources and transportation networks for the life of the project" and that "Significant adverse visual resource impacts would result from placing the transmission line on the natural-appearing landscape", and "would significantly affect the recreation resources in the area", and "would substantially impair visual resources along U.S. Highway 180", in addition to which "potential damage to known cultural objects would be about three times greater under the Gila Alternative" (Alternative C).

The economic health of the San Francisco Valley is to a very large extent dependant upon income derived from recreation activities and the growing retirement community. These in turn are drawn to the area by the peace, tranquility and superlative scenery. Therefore when the Tucson Electric Power Company in 1972 proposed its steel tower transmission line to extend from the Four Corners region down through Glenwood en route to Tucson, a storm of protest arose. The result was an alternate location that avoided desecrating the San Francisco Valley and its special scenic character.

In 1979 the Air Force proposed an extensive training program that would produce tremendous glass-breaking supersonic booms over the Valley and residents fought for five years to protect the recreation and property values. With the help of members of Congress a compromise was reached which greatly reduces the threat.

We mention these incidents to indicate how seriously residents would take the threat of Alternative C if it were to receive further consideration.

Enclosed is Public Hearings Registration Form which we have filled out. Please send us ten more copies.

Sincerely,

*Lowell Sumner Marietta M. Sumner*

Lowell and Marietta M. Sumner

cc: U.S. Forest Service, El Paso Electric Co., Catron County Commission, Residents.

**Advisory  
Council On  
Historic  
Preservation**

The Old Post Office Building  
1100 Pennsylvania Avenue, NW, #809  
Washington, DC 20004

Reply to: 730 Simms Street, Room 450  
Golden, Colorado 80401

February 14, 1985

Charles W. Luscher  
State Director  
New Mexico State Office  
P.O. Box 1449  
Santa Fe, NM 87501

Dear Mr. Luscher:

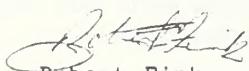
On February 1, 1985, the Council received a copy of the El Paso Electric 345kV, Springerville to Deming, Transmission Line Project. Draft Environmental Impact Statement (DES)." We have reviewed that document. Based on the documentation presented in the DES, it seems apparent that there is a likelihood that historic properties eligible for inclusion in the National Register of Historic Places will be affected should this project be approved.

While the conditions suggested in Appendix 2 are generally adequate to provide protection for historic properties, we believe that some of those conditions will need to be reconsidered and revised in light of the specific nature of the properties encountered and the nature of the project's effects on them.

In addition, we note that, in order to satisfy the substantive requirements of Section 106 of the National Historic Preservation Act (16 U.S.C. 470), BLM will almost certainly have to consult with the New Mexico State Historic Preservation Officer and the Council regarding the probable effects of this undertaking. In order to ensure orderly development of the project and full and thorough consideration of the historic properties, we recommend that BLM initiate that consultation as soon as possible.

If you have any questions or if the Council can be of assistance, please contact Alan Downer at (303) 236-2682 (commercial) or 776-2682 (FTS).

Sincerely,



Robert Fink  
Chief, Western Division of  
Project Review

**Comment Letter 5**



**UNITED STATES DEPARTMENT OF COMMERCE  
National Oceanic and Atmospheric Administration  
Washington, D.C. 20230**

OFFICE OF THE ADMINISTRATOR

March 12, 1985

Mr. Jack Edwards  
Project Leader  
Division of EIS Services  
555 Zang Street, First Floor East  
Denver, Colorado 80225

Dear Mr. Edwards:

This is in reference to your draft environmental impact statement for El Paso Electric 345 (kV) project. Enclosed are comments from the National Oceanic and Atmospheric Administration.

We hope our comments will assist you. Thank you for giving us an opportunity to review the document. We would appreciate receiving four copies of the final environmental impact statement.

Sincerely,

Joyce M. Wood  
Chief, Ecology and  
Conservation Division

Enclosure

DC:Ig



**Comment Letter 5 (Continued)**



**UNITED STATES DEPARTMENT OF COMMERCE**  
**National Oceanic and Atmospheric Administration**  
NATIONAL OCEAN SERVICE  
Washington, D.C. 20230

*Perry 3-12-85*

N/MB2:KEZ

TO: PP2 - Joyce M. Wood  
FROM: N - Paul M. Wolff  
SUBJECT: DEIS 8502.01<- Proposed El Paso Electric 345 (kV) Springerville  
to Deming, New Mexico Transmission Line Project

The subject DEIS has been reviewed within the areas of the National Ocean Service's (NOS) responsibility and expertise, and in terms of the impact of the proposed action on NOS activities and projects.

Geodetic control survey monuments may be located in the proposed project area. If there is any planned activity which will disturb or destroy these monuments, NOS requires not less than 90 days notification in advance of such activity in order to plan for their relocation. NOS recommends that funding for this project includes the cost of any relocation required for NOS monuments. For further information about these monuments, please contact Mr. John Spencer, Chief, National Geodetic Information Branch (N/CG17), or Mr. Charles Novak, Chief, Network Maintenance Section (N/CG162), at 6001 Executive Boulevard, Rockville, Maryland 20852.



Comment Letter 6

Allan Beck  
Star Rt 2 Box 38  
Deming NM 88030  
March 22 1985

Jack D Edwards, Project Leader  
Bureau of Land Management  
Division of EIS Service  
555 Zang Street, First Floor East  
Denver, Colorado 80228

Dear Sir,

In response to the El Paso Transmission Line Project -  
Maps 1-2.

In the Nutt area 6 families oppose the B route from  
mile post 5 B to 30 B.

We prefer PA A from mile post 5A to 30A.

This route will not be an eye sore to us. We will not  
have to look out our windows every day and see it,  
and it is also shorter by a few miles. Since it would  
be away from State Highway 26, it would not be  
seen by people traveling on the highway, and  
vandalism would be less of a problem.

Donald Graham  
Mr & Mrs Fred Franzoy  
Mr & Mrs Ronnie Franzoy  
Mr & Mrs Jerry Cargover  
Mr & Mrs Jim Winder

Sincerely

Allan Beck

April 1, 1985

Dear Sirs:

Please consider my request regarding Proposal B.

We live approximately one mile west of Nutt, N.M. As it is, the line will run close to our house, and run directly in front of our neighbor, Allen Beck's house. As far as I know, Proposal A does not run close to anyone's home.

Thank you,

Tots Bonnie Franzy

## Comment Letter 9

NEW MEXICO DEPARTMENT OF AGRICULTURE

OFFICE OF THE DIRECTOR/SECRETARY  
Box 3189/Las Cruces, New Mexico 88003  
Telephone (505) 646-3007



April 1, 1985

03.40 Edwards.Ltr

Mr. Jack Edwards, Project Leader  
Bureau of Land Management  
Division of EIS Services  
555 Zang Street, First Floor East  
Denver, Colorado 80228

Dear Mr. Edwards:

We have reviewed the draft Management Framework Plan Amendment/ Environmental Impact Statement on the proposed El Paso Electric 345 KV, Springerville to Deming, Transmission Line project. At this time, we have no specific comments. It is our opinion that the impacts resulting from the proposed action or alternatives will not significantly affect the agricultural interests of the State of New Mexico.

We appreciate the opportunity to review and comment on this document.

Sincerely,

*W.P. Stephens*  
William P. Stephens  
Director/Secretary

WPS/kh

## Comment Letter 10



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION VI  
1201 ELM STREET  
DALLAS, TEXAS 75270

APR 03 1985

Mr. Jack Edwards  
Project Leader  
Bureau of Land Management  
Division of EIS Services  
555 Zang Street, First Floor East  
Denver, Colorado 80228

Dear Mr. Edwards:

We have completed our review of the Draft Management Framework Plan Amendment/Environmental Impact Statement (MFPA/EIS) on the proposed El Paso Electric 345 KV, Springerville to Deming, Transmission Line Project, New Mexico.

We categorize your Draft EIS as Lack of Objections (LO). Generally, we have no objection to the proposed action as discussed in the Draft EIS. Our classification will be published in the Federal Register in accordance with our responsibility to inform the public of our views on proposed Federal actions, under Section 309 of the Clean Air Act.

We appreciate the opportunity to review your Draft EIS. Please send our office one (1) copy of the Final EIS at the same time it is sent to the Office of Federal Activities, U.S. Environmental Protection Agency, Washington, D.C.

Sincerely yours,

Dick Whittington, P.E.  
Regional Administrator

## Los Olmos Guest Ranch

P. O. Box 127 • Glenwood, New Mexico 88039 • Phone (505) 539-2311

April 3, 1985

Jack D. Edwards  
Bureau of Land Management

Re: El Paso Electric Company  
345 kV Arizona Interconnection Project

Dear Sir;

This is just to follow up my comments at the meeting in Reserve today, I reaffirm in writing my strong objection to ALTERNATIVE C.

The Glenwood area rely's heavily on tourism to support our economy, including my own business. If the proposed power line were to come through the Glenwood area, I fear it would have an adverse effect on tourism and a negative effect on property values.

Thank You,

Leonard L. Leth - Owner-operator  
LOS OLMO'S GUEST RANCH

## Comment Letter 13



United States  
Department of  
Agriculture

Soil  
Conservation  
Service

517 Gold Avenue SW, Room 3301  
Albuquerque, NM  
87102

April 9, 1985

Mr. Jack Edwards, Project Leader  
Bureau of Land Management  
555 Zang Street, First Floor East  
Denver, CO 80228

Dear Mr. Edwards:

We have reviewed the DEIS for the El Paso Electric 345KV Springerville to Deming Transmission Line. Our review has been concentrated on the issues of soils, vegetation, and livestock grazing.

Our review indicates that the proposed alternative route will not cross any prime farmlands. The route will transect a comparatively low distance across sensitive soils. The loss of 54 AUM's for a short period is considered inconsequential. Consideration of the need for more intensive reclamation efforts on difficult soils and slopes is adequate. The effort to comply with soil protection and land use goals of the individual landowner is commendable.

Appendix two provides very adequate guidelines for erosion control and site restoration.

Thank you for the opportunity to review this document.

Sincerely,

*Ray T. Margo, Jr.*  
Ray T. Margo, Jr.  
State Conservationist  
*acting*



The Soil Conservation Service  
is an agency of the  
Department of Agriculture



**United States Department of the Interior**

BUREAU OF RECLAMATION

SOUTHWEST REGION

COMMERCE BUILDING, 714 S. TYLER, SUITE 201

AMARILLO, TEXAS 79101

IN REPLY  
REFER TO: 150

APR 17 1985

Memorandum

To: Bureau of Land Management, Division of EIS Services, Denver, Colorado

From: **ACTING** Regional Director

Subject: Review of Draft Environmental Statement, El Paso Electric 345 Kv  
Springerville to Deming Transmission Line Project (DES 84-59)

As requested in your letter accompanying the January 1985 subject draft, the Bureau of Reclamation Southwest and Lower Colorado regional offices have reviewed this transmission line proposal. Our review indicates that no existing or proposed Reclamation projects would be affected by the proposed line. We have no comments to offer regarding the proposal or environmental analysis.

A handwritten signature in cursive ink that reads "Gerald L. Wright".

cc: Regional Director, Boulder City, Nevada (Attention: 150)  
Commissioner, Attention: 150

## Comment Letter 16

P. O. Box 7  
Glenwood, New Mexico 88039  
April 20, 1985

Mr. Jack Edwards, Project Leader  
Bureau of Land Management  
Division of EIS Services  
555 Zang Street, First Floor East  
Denver Colorado 80228

Dear Mr. Edwards:

I have studied your Draft Environmental Impact Statement on the El Paso Electric 345 KV Springerville to Deming Transmission Line, Prepared by the Bureau of Land Management January 1985.

Your report evaluates and compares the benefits and losses of the Proposed Action route and three alternative routes fairly and objectively, I believe. I agree with your Proposed Action route, with the Very Large Array Alternative if extension of the Very Large Array is to be carried out as currently planned.

I fervently hope that the Gila Alternative (C) will not be approved or selected. Construction of the proposed transmission line with 130 ft. high steel towers through the most mountainous portion of the Gila Alternative route would be a disaster from the scenic and recreational point of view.

The Gila Alternative would parallel U. S. Highway 180 rather closely for some 80 miles, crossing the highway three times; crossing the San Francisco River twice, the crossing at PSC being at an unusually scenic and heavily used area; crossing the Gila River close to Highway 180, dominating the landscapes seen and now enjoyed by people traveling this highway.

People living in the communities and ranches along and near this portion of Highway 180 have chosen to live in the relatively unspoiled, relatively natural setting of this picturesue environment. It is

**Comment Letter 16 (Continued)**

2.

especially attractive and important to retired and ~~e~~ RECEIVED people.

Many local businesses are based on the scenic and recreational character  
of this region.

EIS OFFICE

The proposed transmission line, dominating and changing the  
natural scenes, would ~~not be~~ significantly detract from these resources  
and would not be an acceptable alternative.

Sincerely,

Ben M. Thompson



DEPARTMENT OF THE ARMY  
ALBUQUERQUE DISTRICT, CORPS OF ENGINEERS  
P O BOX 1580  
ALBUQUERQUE, NEW MEXICO 87103-1580

REPLY TO  
ATTENTION OF

April 18, 1985

Engineering and Planning Division  
Planning Branch

Mr. Jack Edwards, Project Leader  
Bureau of Land Management  
Division of EIS Services  
555 Zang Street, First Floor East  
Denver, CO 80228

Dear Mr. Edwards:

The Bureau of Land Management's Draft Environmental Impact Statement on the El Paso Electric 345 KV Springerville to Deming, Transmission Line Project has been reviewed in relation to the Albuquerque District's responsibilities for flood control and administration of Section 404 of the Clean Water Act.

Proposed alternatives, including the proposed action, would not affect any existing or planned flood control facilities within District boundaries, i.e., alternatives proposed east of the Continental Divide. Also, no significant consequences related to flood hazards are foreseen.

The alternatives proposed do not involve the discharge of dredged or fill material into waters of the United States and would not require a Department of the Army permit. This determination applies to all alternatives in their entirety.

This document is well prepared and the opportunity to comment is appreciated.

Sincerely,

John J. Cunico, P.E.  
Acting Chief  
Engineering and Planning Division

Copies Furnished:

SWDPL-R

**Comment Letter 19**



Corporation Tyrone Branch, Tyrone, New Mexico 88065 • (505) 538-5331

April 22, 1985

Mr. Jack Edwards, Project Leader  
Bureau of Land Management  
Division of EIS Services  
555 Zang Street, First Floor East  
Denver, Colorado 80228

Dear Mr. Edwards:

The following comments are furnished regarding the draft EIS dated January, 1985, concerning the proposed Gila Alternative Route C for the El Paso Electric 345 KV Springerville to Deming Transmission Line.

Proposed Route C would have an adverse effect on both Phelps Dodge Corporation and Pacific Western Land Corporation (a wholly owned subsidiary of Phelps Dodge) land from point 40C to 65C. Because of the less-than-detailed plotting of Route C on the map furnished with the draft EIS, exact impacts cannot be determined until precise data has been made available. Of extreme importance is that as we plot the proposed route it literally bisects our Phelps Dodge Tyrone Townsite, described in Attachments A and B. In general, from point 40C to 65C, construction would damage grazing land and the line would transverse prime rural building sites. Please note attachment C, on which we have plotted Route C as precisely as possible and on which we have highlighted Phelps Dodge and Pacific Western properties. In summary, Phelps Dodge Corporation strongly objects to the use of Alternate C by El Paso Electric Company.

Very truly yours,

Richard E. Rhoades  
Manager

WLA:erc

Attachments:    A. Verbal description of Townsite  
                    B. Legal descriptions  
                    C. Maps

cc w/o attach:

B. H. Ormand  
Pacific Western Land Corporation

B. McNeil  
El Paso Electric Company

## Comment Letter 21

### Tucson Electric Power Company

220 West Sixth Street  
P. O. Box 711  
Tucson, Arizona 85702

Robert K. Alexander  
Vice President

(602) 745-3360

April 23, 1985

Mr. Jack Edwards, Project Leader  
Bureau of Land Management  
Division of EIS Services  
555 Zang Street, First Floor East  
Denver, Colorado 80228

Dear Mr. Edwards:

SUBJECT: (MFPA/EIS) El Paso Electric  
345 kV Springerville to Deming  
Transmission Line Project

On April 18, 1984, and again on November 6, 1984, I forwarded the attached comments on the above project which identified significant issues and concerns relating to your proposed Alternate C route for the subject EHV transmission line. In that correspondence, we identified four basic concerns related to topography, access, aesthetics, and reliability. From our experience related to these concerns, it appears that the comparative costs applied to the Alternate C Alignment in your draft EIS may be low. However, the draft EIS indicates that the final route selection will be in the vicinity of the Proposed Alignment or Alternate B. Therefore, a further discussion of Alternate C limitations appears unnecessary.

We appreciate the opportunity to comment on the EPE request and have no comments on the preferred routes to the North and East of the Apache and Gila National Forests.

Yours truly,

  
Vice President, Engineering

RKA:HDB:jb  
Enclosure

cc: John Whitacre  
El Paso Electric Co.

Kenneth C. Scoggin  
Forest Supervisor  
Gila National Forest

El Paso Electric's transmission line should follow alternative one (near Silver City and Jerome) for these reasons:

1. It is the shortest route therefore representing the least cost to electric consumers.
2. Less risk of impacts to the Very Large Arroyo
3. Less visual impact would be noticed if the line is run through forested area than if it were run through the relatively bare San Augustin Plain.
4. There is an existing corridor near Alternative one route that could be used for the line.

Sincerely  
Lorraine Hyatt

STATE OF NEW MEXICO

CATRON COUNTY

RESERVE, NEW MEXICO 87830

SHARON ARMijo  
CLERK - P.O. BOX 197  
(505) 533-6400

DEBBIE LEE  
TREASURER - P.O. BOX 417  
(505) 533-6384

PEGGY ESTRADA  
ASSESSOR - P.O. BOX 416  
(505) 533-6577

JESSE CAREY  
SHERIFF - P.O. BOX 476  
(505) 533-6222

MARY BETH WELLBORN ATWOOD  
PROBATE JUDGE

ERNEST CARREJO  
COMMISSIONER DISTRICT NO. 1

GLYN GRIFFIN  
COMMISSIONER DISTRICT NO. 2

DAVID M. VACKAR, CHAIRMAN  
COMMISSIONER DISTRICT NO. 3

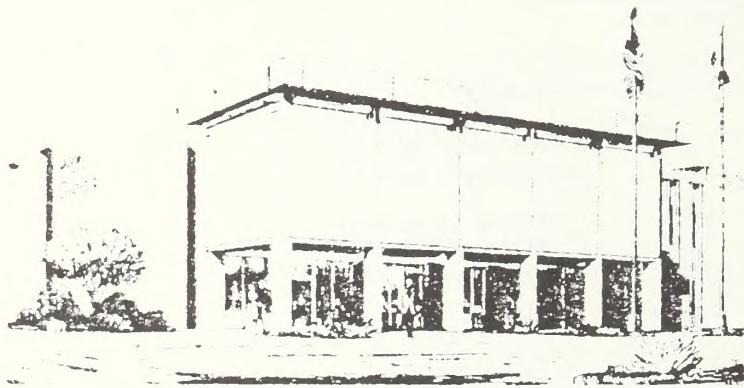
COMMISSION OFFICE  
P.O. BOX 507 - (505) 533-6423

April 26, 1985

Dear Mr. Edwards

Please find enclosed Catron County's comments concerning the proposed El Paso Electric transmission line thru Catron County. We look forward to being very involved in the final decision on the route to be taken. Please contact us if we can be of any assistance.

Sincerely,  
David M. Vackar



**Comment Letter 25 (Continued)**

- 1 -

April 26, 1985

Mr. Jack Edwards  
Bureau of Land Management  
Division of EIS Services  
555 Zand St., First Floor East  
Denver, Colorado 80228

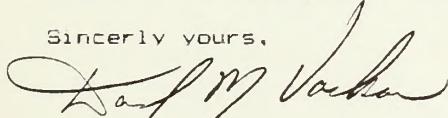
Dear Sir:

It is a consensus of the Catron County Commission that if El Paso Electric does obtain permission to build a new powerline from Springerville Arizona, to Deming, New Mexico, that line should follow proposed route E, otherwise called the San Agustin Alternative.

Local input to the Catron County Commission from county residents was overwhelmingly in favor of Alternative E, especially when compared to Alternative C. Local residents most strongly opposed Alternative C due to it's crossing such a large amount of National Forest land and it's very negative impact on present and future tourist traffic coming into Catron County on US highway 180. Our economy here in Catron County, currently very depressed, depends heavily on tourism for current revenues and jobs. Of the three industries that Catron County's economy depends on, ranching, timber, and tourism, the latter appears to be the only one with any potential for growth and expansion.

Therefore, I again advise that the Catron County Commission strongly urges the Department of the Interior thru its' Bureau of Land Management to approve only Alternative E (San Agustin Alternative) as a possible route for the proposed El Paso Electric Transmission Line from Springerville, Arizona, to Deming, New Mexico, thru Catron County.

Sincerely yours,



David M. Yackar  
Chairman,  
Catron County Commission



United States Department of the Interior

NATIONAL PARK SERVICE

SOUTHWEST REGION

P.O. Box 728

Santa Fe, New Mexico 87501

IN REPLY REFER TO:

L7619(SWR-PE)

MAY 2 1985

Memorandum

To: Jack Edwards, Project Leader, Bureau of Land Management, Division of EIS Services, Denver, Colorado

From: Associate Regional Director, Planning and Cultural Resources, Southwest Region

Subject: Review of Bureau of Land Management El Paso Electric 345 KV, Springerville to Deming, Transmission Line Project, Draft Environmental Impact Statement, New Mexico (DES 84/59)

We have reviewed the subject document and find that it adequately addresses the concerns of this agency.

*Eldon G. Rey or*

**RE**

Form 1279-3  
(June 1984)

BORROWER'S CA

TD 195 E37 EA 1985b

Final management frame  
plan

DATE LOANED	BORROWER due
2/24/88	Marty Sharp 347-98 <del>3/9/88</del> Worland
USDI - BLM	

Bureau of Land Management  
Library  
Bldg. 50, Denver Federal Center  
Denver, CO 80225

Bureau of Land Management

Denver Service Center

Division of EIS Services

555 Zang St. - First Floor East

Denver, CO 80225

OFFICIAL BUSINESS  
PENALTY FOR PRIVATE USE \$300

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Bureau of Land Management  
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Denver Federal Center, Bld. 50  
Denver, CO 80225  
(1)

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